STATE OF CALIFORNIA – CALIFORNIA ENVIRONMENT PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1011 N. GRANDVIEW AVENUE
GLENDALE, CA 91201
(818) 551-2800

INSPECTION REPORT

ROLLINS OIL PROCESS COMPANY, INC.

5756 Alba Street
Los Angeles, CA 90058

EPA ID NO. CAD050806850

Inspected By: Jose Diaz

Dates of Inspection: October 13 & 14, 1994

Date of Report: November 21, 1994

Report Written By: Jose Diaz

I. PURPOSE:

To Conduct a Compliance Evaluation Inspection (CEI) of a Resource Conservation and Recovery Act (RCRA) permitted treatment, storage, and transfer hazardous waste facility.

II. REPRESENTATIVES PRESENT:

Rollins Oil Process Company, Inc. (Rollins OPC):

William J. Mitzel, President
Wilfred I. Ndubuizu, Environmental Affairs Manager
Chris J. Lilley, Technical Manager
Desmond Phillips, Operations Manager
Richard A. Iniguez, Technical Representative

California Environmental Protection Agency/Department of Toxic Substances Control (Department):

Jose Diaz, Hazardous Substance Scientist (HSS)
Larry Stuck, HSS (Present on October 13, 1994)
Robert Krug, HSS (Present on October 13, 1994)
Carlos Ortega, HSS (Present on October 14, 1994)

III. OWNER/OPERATOR:

Rollins OPC is operated by Rollins Environmental Services (formerly operated by Oil Process Company [OPC]), and is located at:

5756 Alba Street
Los Angeles, CA 90058

Rollins OPC is a wholly owned subsidiary of Rollins Environmental Services, a Delaware corporation located at:

One Rollins Street
Wilmington, Delaware 19803

IV. **BACKGROUND:**

January 29, 1979	OPC obtained a hazardous waste hauler registration from the Department.
August 6, 1980	OPC submitted their Part A application identifying their hazardous waste activity as treatment, storage, disposal and transportation.
June 3, 1985	OPC was issued a Hazardous Waste Facility Permit by the Department for the storage, treatment, and transfer of identified hazardous waste in tanks and containers.
September 19, 1985	A transporter inspection was conducted at the facility by Department inspectors. Numerous manifest discrepancies were found.
October 14, 1985	OPC submitted to the Department a revised Notification of Hazardous Waste Activity form in which they identified their treatment process.
June 17, 1986	The Department issued OPC a Notice of Violation (NOV) for failing to maintain liability insurance for transportation operations.
August 29, 1986	The Department issued a notice revoking OPC's hauler registration. Simultaneously, OPC submitted proof of liability insurance and the revocation was cancelled.
September 19, 1986	A complaint inspection was conducted at the facility. OPC was found in violation of the following transporter violations: storing hazardous waste over 96 hours, transporting hazardous waste with incomplete manifests, not listing their

transporter EPA ID number, accepting manifests without generator signatures.

January 22, 1987 — A follow-up to the September 19, 1986 inspection was conducted. OPC was found in compliance.

September 23, 1987 — A RCRA inspection was conducted at the facility by the EPA. OPC was found in violation of the following: poor management of containers, inadequate aisle space, inadequate operating record, and shipping hazardous waste without a manifest.

December 1988 — OPC was bought by Rollins Environmental Services Rollins and became Rollins Oil Process Company, Inc.

May 16, 1989 — As part of the permit renewal process, an inspection was conducted at the facility by the Department. Rollins OPC was found to have installed and/or was operating the following hazardous waste management units that were not identified in their permit and approved operation plan: four Baker tanks, one sludge filter press, one steam stripper, and three carbon absorption tanks. The facility was also storing off-site hazardous waste in non-stationary containers outside of the approved and certified hazardous waste storage area.

May 31, 1989 — The Department issued Rollins OPC a letter directing them to immediately discontinue the drum storage operation and the use of illegal units.

July 17, 1989 — A complaint inspection was conducted at the facility by the Department as a result of the May 16, 1989 visit. Some of the violations noted were: storing and treating hazardous waste in eleven units that were never approved by the Department, failing to notify the Department at least 30 days in advance of the addition of twenty-one storage and/or treatment units, storing waste cyanides and acids in close proximity, storing reactive waste less than 50 feet from the

	property line, failure to store water reactive waste in an enclosed and contained storage area, open containers, inadequate labeling, and inadequate aisle space.
March 12, 1990	A RCRA inspection was conducted at the facility by EPA. A Department inspector also attended. Some of the violations noted include: non-representative inventory log for the storage area, unlabeled containers and tanks, inadequate personnel training, and incomplete waste analysis plan.
May 29, 1990	A Hazardous Waste Facility Permit renewal with modifications for the storage, treatment and transfer of off-site generated hazardous waste was issued to Rollins OPC.
August 31, 1990	Rollins OPC's hauler registration expired. The hauler used now is Custom Environmental Transport (CET), which is a wholly owned subsidiary of Rollins Environmental.
March 6, 26 and April 3, 1991	The Department conducted a CEI and the following violations were noted: storage of waste not identified in the operation plan, no secondary containment for container storage area, inadequate aisle space, improper labeling of containers, failure to inspect and document discrepancies on inspection log, storage of ignitable waste within 50 feet of the property line, storage of on-site waste over 90 days, failure to close drums when not in use.
May 8, 1991	Rollins OPC sent a revised Closure Plan and Closure Cost Estimate to the Department.
September 25, 1991	Science Applications International Corporation, a contractor representing EPA, conducted an inspection and the following violations were noted: drum storage capacity was exceeded, stored waste acid in the storage bay designated for basic wastes.

January 6, 1992	The EPA conducted a RCRA inspection with DTSC personnel present. No violations were found.
May 20, 1992	The Department and Rollins OPC settled alleged violations identified in Reports of Violation dated August 7, 1990 and April 19, 1991. A Consent Agreement was issued in response to the violations discovered and Rollins OPC paid a penalty of $325,000.
June 18 and July 24, 1992	A CEI was conducted by the Department and the following violations were noted: unlabeled containers and missing land disposal restriction notices on outgoing manifests. No penalties were assessed.
October 14, 1992	Rollins OPC submitted an updated Part A application to reflect a name change of the facility from Oil Process Company to Rollins Oil Process Company, Inc.
December 2, 1992	A CEI was conducted by the Department and the following violations were found: 96 containers missing a statement which call attention to the particular hazardous property of the waste, an open container, missing information on the contingency plan and missing times of inspection on the inspection logs.
June 18, 1943	Science Applications International Corporation, a contractor representing EPA, conducted an inspection. The only deficiency noted was that Rollins OPC failed to specify the analytical techniques or methods used in the monitoring records.

V. DESCRIPTION OF FACILITY:

The Rollins OPC facility is located at 5756 Alba Street in Los Angeles, California, adjacent to the Cities of Vernon and Huntington Park. The 2.1 acre facility **(Attachment A)** began operations as a transporter in 1979. In June of 1985, OPC began to receive off-site generated waste for treatment and subsequent sewer discharge of treated effluent. They currently operate as a drum storage facility, wastewater treatment facility, container repackaging facility and transfer facility for ChemPak Inc., a lab-packaging division

of Rollins.

Rollins OPC currently employs 45 people. The hours of operation are 6:00 a.m. to 10:00 p.m. and receiving hours are between 7:30 a.m. and 3:30 p.m. Five employees work on the second shift.

At the time of our visit Rollins OPC had completed approximately 75% of the permitted renovation of the facility, which included the new drum warehouse and bulking and container repackaging operation areas.

VI. DESCRIPTION OF HAZARDOUS WASTE ACTIVITY:

Rollins OPC is permitted to treat and store hazardous waste in the units identified in its approved Operation Plan and permit dated May 29, 1990.

The treatment processes performed by Rollins OPC consist of: carbon absorption, blending compatible wastes, oxidation of cyanide waste, reduction of hexavalent chrome to trivalent chrome and neutralization and solidification of waste waters with heavy metals. The wastewater treatment process includes coagulation, flocculation, clarification, and filtration. The eventual disposal mechanism is to the sanitary sewer. Residues generated from the treatment activities (filter cake containing heavy metals and spent activated carbon) are collected in roll-off containers, manifested for off-site disposal and transported to Chemical Waste Management Kettleman Hills (Kettleman) in California, to Envirosafe Inc. in Idaho or to "Highway 36" in Colorado.

The wastewater treatment unit consists of: nine above ground storage tanks (AST, V-1 through V-6, are horizontal with smaller capacities than V-8 through V-10 which are vertical), carbon absorption canisters to strip any organics, a caustic scrubber (lime column), a fume incinerator and a filter press (60 cubic foot capacity).

Treatment of aqueous waste occurs in 4,500 gallon to 8,000 gallon batches under authority of their current permit.

If the incoming wastestream is acidic or contains heavy metals, including hexavalent chrome, then the wastes are put into tank V-1 (10,000 gallon capacity). If the wastestream is basic or contains cyanide, tank V-2 (10,000 gallon capacity) is the receiving tank.

Sludge collected from the treatment activities in Tanks V-1 and V-2 are collected in Tank V-3 (10,000 gallon capacity).

They are then pumped through a clarifier and then on to the filter press.

After treatment in Tanks V-1 and V-2 samples are taken, and if treatment is determined to be complete, the effluent (as well as the filter press filtrate) is pumped into Tank V-4 (10,000 gallon capacity). After further gravity separation in V-4 the supernatant is transferred to Tank V-8, a 100,000 gallon holding tank. To remove any remaining organics, the filtrate and supernatant from V-8 is pumped through a carbon absorption system. The effluent is then pumped into a check tank, Tank V-5 (8,200 gallon capacity). When this tank reaches its capacity it is sampled and, if it meets the established Los Angeles City Bureau of Sanitation criteria, it is discharged into the sewer (Rollins OPC has a industrial wastewater permit). The spent carbon is manifested to Rollins in Deer Park, Texas, for incineration.

Tank V-6 (10,000 gallon capacity) is used as a holding tank for low BTU wastes. Tank V-9 (100,000 gallon capacity) is used to store rainwater that is sent through the wastewater treatment process prior to sewer discharge. Tank V-10 (20,000 gallon capacity) is used to store waste with a high BTU value. Wastes from tanks V-6, V-8, V-9, and V-10 are sent through the vapor thermal oxidizer prior to sewer discharge. An activated carbon canister is available as a back-up.

Inorganic vapors from Tanks V-1, V-2, V-3, and V-4 are pumped through the caustic scrubber while volatile organic compounds from the vapor recovery system are burned in the fume incinerator.

When Rollins OPC accept a waste, a copy of the manifest is given to the shipping supervisor, and the original goes to the Shipping/Receiving Manager. If Rollins OPC accepts the waste, each container is assigned a tracking number (ROPC #). This number is placed directly on the container and written in a waste receipt log. It is also cross-referenced on all internal computer generated tracking records. Approximately 2,000 drums come in each month.
The bulking and container repackaging operation begins with a physical and analytical compatibility testing. Then the incoming wastes are consolidated into homogeneous wastestreams for off-site incineration. The waste is transported under manifest to one of the incineration facilities Rollins operates in Deer Park, Texas or Baton Rouge, Louisiana. Residue from this operation consists of empty drums which are crushed, on-site, collected in roll-off containers and manifested for off-site landfill disposal at Kettleman.

Recyclable liquid waste is shipped to Oil and Solvent

Processing Company (OSCO) in Azusa, California. Mercury batteries and fluorescent lights\tubes are shipped to Mercury Recovery Services in Monrovia, California, or to a recycler in Betlehem, Pennsylvania. Lead acid and nickel-cadmium (NiCd) batteries sent to any of the local recyclers.

VII. OBSERVATIONS:

On October 13, 1994, at approximately 0930 hours, Larry Stuck, Robert Krug and I, Jose Diaz, arrived and signed in at the facility's security office. We requested to see Wilfred Ndubuizu, the environmental manager, and after few moments we were met by Ndubuizu. Ndubuizu directed us to a conference room where Chris Lilley and Desmond Phillip joined us for an opening conference. I explained the that purpose of our visit was to conduct a compliance evaluation inspection which consisted of a facility walk through, record review, the taking of photographs and possible collection of samples. I requested their consent to conduct the above activities and the consent was granted.

Lilley began by describing Rollins OPC's hazardous waste activities. Lilley explained that Rollins OPC is a full service treatment storage and transfer facility. Rollins OPC also acts as broker or third party for the generators and disposal facilities. When a customer calls to arrange a shipment to Rollins OPC they are required to fill out a waste data sheet. If Rollins OPC is not satisfied with the information provided on the data sheet then an analytical is performed on a sample of the waste by Rollins OPC. This is in turn reviewed by OPC's technical staff and is assigned an OPC specific tracking number (specific to the wastestream). Arrangements for a shipment time and a price are then sent to the customer. In loads of like waste greater than 10 drums, samples are taken from 10% of the drums for fingerprint analysis. In some cases up to 50% the incoming liquid wastes are sampled and analyze. All bulked loads are sampled for analysis. Liquids are sampled and combined for a composite analysis. If there is a discrepancy or problem each sample is reanalyzed for identification.

Phillip then explained the steps in the waste treatment processes and the waste water treatment system (See section VI).

Walk through:

At approximately 1000 hours we began our walk through accompanied by Lilley, Phillip and Ndubuizu with a visit to the loading dock of the newly constructed container storage

warehouse **(Attachment B and Attachment C, Photo #1)**. In the warehouse we observed five bays, each with two rows of pallets, of hazardous containers **(Photo #2)**. After a brief inspection of several containers on each row, we discovered a pallet containing four NiCd batteries and three lead-acid batteries with no hazardous waste label in the "Poison Bay" **{Violation Count 1} (Photo #3)**. Phillip then showed us a few of the components of the proposed bulking and repackaging system which include the use of conveyor belt to transfer the containers to a sampling **(Photo #4 & #5)** where the finger printing of the contents will take place. The specific waste stream will then be piped to one of the 3000 gallon tanks and repackaged and shipped off-site for incineration or other treatment. Lilley then showed us the new drum crushing machine and the solid waste compactor. Lilley pointed out that when the new system begins operation it will significantly reduce their operation costs and increase the capacity of the repackaging and bulking operation.

As we exited the container storage warehouse we observed two roll-off bins identified as containing crushed drums. Both were covered and labeled. Just north of this area we observed two rows of pallets with hazardous waste containers of different sizes and composition. Inspection of these containers revealed that several of their hazardous waste labels were missing information describing the hazardous property and the physical state or composition of the waste.

We then proceeded to the temporary drum storage area which is a large concrete pad divided into three bays by eight inch high berms. Two of the bays are again divided by a rollover curb to allow for forklift access and to assist in containment. The five bays are covered by a sheet metal roof. Starting at the southernmost side the bays are identified "A" through "G". Due to the large quantity of containers stored in this area, we chose to inspect one or two containers per pallet. If any discrepancies were noted then other containers in the immediate vicinity were closely examined. We began inspecting containers in the northernmost bay (Bay G) which was being used to store cyanides and bases. Stuck pointed out to the Rollins OPC employees that two 55-gallon drums (ROPC #'s 79312 and 79313) had blank hazardous waste labels. Phillip showed us the Chempak Drum Inventory which indicated that the drums contained ferric chloride filter cake **(Photo #6)**. Again, throughout our inspection we noted that several (30 to 40) of the containers' hazardous waste labels were missing information describing the hazardous property and physical state or composition of the wastes contained therein. In some instances we noted that the information on the labels was illegible as the writing had been erased or faded. **{Violation Count 1}**.

In Bay "G" we observed a "lab-pack" identified as containing arsenic acid (D004), with the generator accumulation date of September 15, 1993, and with Rollins OPC receipt date of October 5, 1993 (storage longer than a year). **{Violation Count 2}.** The hazardous waste label was also missing information regarding the composition and physical state, and the hazardous property of the waste **{Violation Count 1}.**

We broke for lunch at 1230 hours and returned at 1320 hours.

We resumed our walk through by proceeding to inspect a number of containers located south of the temporary storage area. Lilley told us that these containers were being prepared to be emptied into process tank V-1 for an acid batch treatment. We observed that there were several containers holding basic waste stored in between or next to the acidic waste containers. A Chempak Drum Inventory Sheet described the contents of the basic waste as having a pH of 13 **{Violation Count 3} (Attachment D) (Photo #7).**

We were then directed to look at the storage shed where PCB's and reactive wastes are stored separately. These are identified as bay "H" and "I" respectively. Bay "H" which is used to store PCB's was empty. We observed approximately nine containers identified as containing reactive waste in Bay "I". The shed had secondary containment.

There was a portable eyewash station located at the TSA. The nearest communication device (phone) was located near the truck washout area. Loudspeakers were located throughout the facility as well as portable spill kits. A shower/eyewash was at the north end of the site.

Next, we looked at the above ground storage tanks (AST) in the wastewater treatment area. All tanks were placarded with NFPA symbols **(Photo #8).** The area was cleaned and the secondary containment surface was in good condition. Phillip explained that the tanks have high level alarms and high level feed cutoffs located at the control panel. The carbon absorption canister and caustic scrubber were pointed out to us **(Photo #9).** The canister is recharged about every 2 months. The spent carbon is sent for incineration because there are too much waste contained in the carbon and it cannot be sent for regeneration. The caustic scrubber operates at a flow rate of at least 30 gallons per minute and the pH is maintained at about 11.

At the rear of AST V-10, Lilley showed a 600-gallon AST containing nitrogen **(Photo #10).** Phillip explained that the nitrogen is used as blanket around V-10 to minimize the possibility of explosion.

As we walked along the north property line next to the filter press unit we observed an accumulation of dry filter cake outside the secondary containment area **(Photo #11)**. Phillip stated that this rusty-brownish colored material seemed like that same type of material as that which is generated by the filter press unit. We directed the Rollins OPC employees to not clean up the area until we collected a sample. After donning additional personal protective equipment I collected a sample of the material for further analysis **(Photos #12 & #13)**. A split sample was given to Ndubuizu. **{Violation Count 4} (Attachment E)**

Due to the lateness in the day, we decided to terminate our inspection and return the next day for the record review. We held a brief meeting to discuss our observations. William Mitzel, President of Rollins OPC, and Richard Iniguez, technical representative were also present during this conference.

On October 14, 1994, Carlos Ortega and I returned to Rollins OPC to conduct the record review. We arrived at the facility at 0930 hours and were joined by Mitzel, Phillip, Ndubuizu, Lilley and Iniguez. Mitzel granted us consent to conduct the record review.

Record Review:

Part A Application - The document was available for review and found to be adequate.

Operation Plan (Part B)

The waste analysis plan, contingency plan and closure plan were also available for review and were found to be adequate.

Financial Requirements - Ndubuizu provided us with a copy of an amendment to Letter of Credit No. 422-85-27 dated March 29, 1985. The line of credit has been increased to $386,028.00 to compensate for the current estimated closure cost of $375,256.00 (adjusted for inflation at 2.7%) for the existing and new units. **(Attachment F)**

Operating Record

Inspection Logs - A review of the "Daily Inspection Records of Processing Plant Equipment", the "Waste Container Storage Area Inspection" and "Bulk liquid and Solid Container Area Inspection List" revealed that on several instances inadequate information was documented or missing. **{Violation Count 5} (Attachment G)**

Personnel Training Records - The list of training requirements for the plant operations manager was not available. The training records for Gary Young were also not available for review. We requested that these records be submitted to our office as soon as possible **{Violation Count 6}.**

Manifests - Rollins OPC keeps copies of manifests from both incoming and outgoing wastes. Due to the large quantity of manifests we chose to review a random representative sample from each of the last three years. No violations were found.

Incident Report - We obtained a copy the Preliminary Incident Investigation Report describing the filter cake spill. **(Attachment H)**

III. **SAMPLING:**

The sample was transported under chain of custody to our office where it was placed in a secure location. The sample was transported to the laboratory on October 18, 1994 and received Janice Wakakuwa **(Attachment I).**

IX. **VIOLATIONS:**

COUNT 1: Rollins OPC violated Title 22, Cal. Code Regs., section 66262.34 (f) 3(A)(B)(C), and Hazardous Waste Facility Permit, Section III, C, d (1), (2), (3) and (4), in that on or about October 13, 1994, Rollins OPC failed to label containers of hazardous waste or to include all the information required on the labels.

Evidence: Stuck, Krug and Diaz observed a pallet containing NiCd batteries and lead-acid batteries in the container storage warehouse. The NiCd batteries were not labeled. We informed Lilley, Phillip and Ndubuizu that the lead acid batteries are exempt from the labeling requirements, but the Ni-Cd batteries must be labeled **(Photo #3) (Attachment K).**

In Bay "G" we observed a "lab-pack" identified as containing arsenic acid (D004). The hazardous waste label was also missing information regarding the composition and physical state, and the hazardous property of the waste. Stuck pointed out to the Rollins OPC employees that two 55-gallon drums (ROPC #'s 79312 and 79313) had blank hazardous waste labels. Phillip showed us the Chempak Drum Inventory which indicated that the drums contained ferric chloride filter cake **(Photo #6).**

Throughout the temporary drum storage area we observed

several containers (30 to 40) whose hazardous waste labels were missing information. In some instances information such as the composition and physical state of the waste or the particular hazardous property of the waste was missing. In other cases all the information on the label was not legible as it had been erase or faded by the elements. Lilley stated that it is very difficult to ensure that the generators include all the information on the labels and he asked if the Department could help in anyway.

COUNT 2: Rollins OPC violated Title 22, Cal. Code Regs., section 66268.50 (c) in that on or about October 13, 1994, Rollins OPC stored waste beyond one year for reasons other than accumulating the waste to facilitate proper recovery, treatment, or disposal.

Evidence: In Bay "G" we observed a "lab-pack" identified as containing arsenic acid (D004), with generator accumulation date of September 15, 1993, and with Rollins OPC receipt date of October 5, 1993. The hazardous waste label was also missing information regarding the composition and physical state, and the hazardous property of the waste. Lilley stated that they must have lost track of this container and that it would be processed immediately.

COUNT 3: Rollins OPC violated Title 22, Cal. Code Regs., section 66264.177 (c), in that on or about October 13, 1994, Rollins OPC stored containers holding a hazardous waste that was incompatible with other wastes, without any means of separation such as dike, berm, wall or other device.

Evidence: Stuck, Krug and Diaz observed several containers of hazardous waste stored within a sloped bay south of the temporary drum storage pad. We observed two 55-gallon drums labeled as containing waste sodium cyanide (ROPC #91109) and copper cyanide **(Attachment D) (Photo #7)** stored in between containers labeled as containing waste flouboric acid, acetic acid solution, hydrochloric acid and nitric acid. Lilley stated that they were getting ready to process a batch of acidic wastes and that the sodium cyanide and copper cyanide waste should have not been stored there and that apparently four pallets were mixed in by mistake. We also observed a 5-gallon container labeled as holding sodium hydroxide (ROPC #88112), stored next to a hydrochloric acid container. We found other containers holding ammonium hydroxide (ROPC #88046) **(Attachment D)**, sodium hydroxide (ROPC #93040), potassium dichromate (ROPC #93009), Potassium

hydroxide (ROPC #93039) and sodium hypochlorite (ROPC #93071) stored next to acids on the same pallets.

COUNT 4: Rollins OPC violated Title 22, Cal. Code Regs., section 66264.31, in that on or about October 13, 1994, Rollins OPC did not maintain and operate the facility so as to minimize the possibility of an unplanned sudden or non-sudden release of hazardous constituents to the air, or surface water which could threaten human health or the environment.

Evidence: Stuck, Krug and Diaz observed wastewater treatment filter media spilled outside the secondary containment area of the filter press unit. The rusty-brown colored material was dry. We asked Phillip if the material was generated by the filter press unit and he stated that the material seemed similar to that generated by the filter press unit and which is manifested off-site for disposal. A sample of the material was collected **(Attachment E and Photos #11, #12 and #13).**

The next day, during the record review, Phillip provided us with a copy of the Preliminary Incident Investigation Report which details the occurrence and the corrective action taken. **(Attachment H)**

COUNT 5: Rollins OPC violated Title 22, Cal. Code Regs., section 66264.15 (d), in that on or about October 14, 1994, Rollins OPC failed to adequately record all the information required on the inspection logs.

Evidence: Ortega and Diaz observed that several of the Daily Inspection Records of Processing Plant Equipment, the Waste Container Storage Area Inspect Reports and the Bulk Liquid/Rolloff container area logs were missing the name of the person conducting the inspection. Some reports had signatures which were not legible, others were only initialed and others only had the first name of the person conducting the inspection **(Attachment G).**

COUNT 6: Rollins OPC violated Title 22, Cal. Code Regs., section 66264.16 (d), in that on or about October 14, 1994, Rollins OPC failed to provide the training records for Gary Young and the list of training requirements for the Plant Operations manager.

Evidence: Ortega and Diaz observed the training records for Gary Young were not available. Lilley stated that Gary Young was a new employee and that Rollins OPC had requested the training records from Young's previous employer, but had not received them. The list of training requirements for

the plant operations manager was also not available. Lilley told us to let Phillip, who is the plant operations manager, explain why those records were not available. Phillip went on to talk about his education and work experience. Ortega then informed Phillip, Lilley and Ndubuizu we still must see documents describing the training or job experience as required by the regulations. We requested that copies of these documents be submitted to our office.

X. **DISCUSSION WITH MANAGEMENT:**

At the conclusion of the inspection we discussed the Field Report of Violations (FROV) **(Attachment J)** with William Mitzel, Chris Lilley, Desmond Phillip, Wilfred Ndubuizu and Richard Iniguez. I explained that NiCd batteries located in the new container storage warehouse storage area must properly labeled. We also discussed the storage of incompatible waste at the staging bay. Phillip told us that Rollins OPC does not recognize that area as a storage area but as a "staging" area. I informed them all spills of filter cake at the filter press unit must be cleaned up promptly. The hazardous waste labels with missing information were discussed. The possible unauthorized operation of a drum crushing unit was addressed. At the time of the inspection the Rollins OPC employees were not able to demonstrate that Rollins OPC was authorized to operate the drum chrusing unit. [Later in our office, a review of the facilitie's Part B document revealed that Rollins OPC was authorized to operate such equipment.] The inspection logs for the Daily Inspection Records of Processing Plant Equipment, the Waste Container Storage Area and the Bulk Liquid/Rolloff container area should include all the information as required by the regulations. We requested that the missing training records for Gary Young and the plant operations manager be submitted to our office, and finally the issue of load rejection procedures was discussed. A signed copy of the FROV was issued.

XI. **ATTACHMENTS:**

A. Facility Map - 1 page
B. Map of the New Drum Storage Warehouse - 1 page
C. Photographs #1 - #13 - 7 pages
D. Chempak Drum Inventory Sheets - 2 pages
E. Split Sample Receipt - 1 page
F. Financial Requirements - 6 pages
G. Daily Inspection Logs - 3 pages
H. Preliminary Incident Report - 3 pages
I. Sample Analysis Requests and Chain of Custody - 1 page
J. Field Report of Violation - 2 Pages
K. Hazardous Waste Facility Permit - 2 pertinent pages

L. Permit Inspection Checklist - 10 Pages

XIII. **SIGNATURES**:

Jose Diaz
Hazardous Substances Scientist

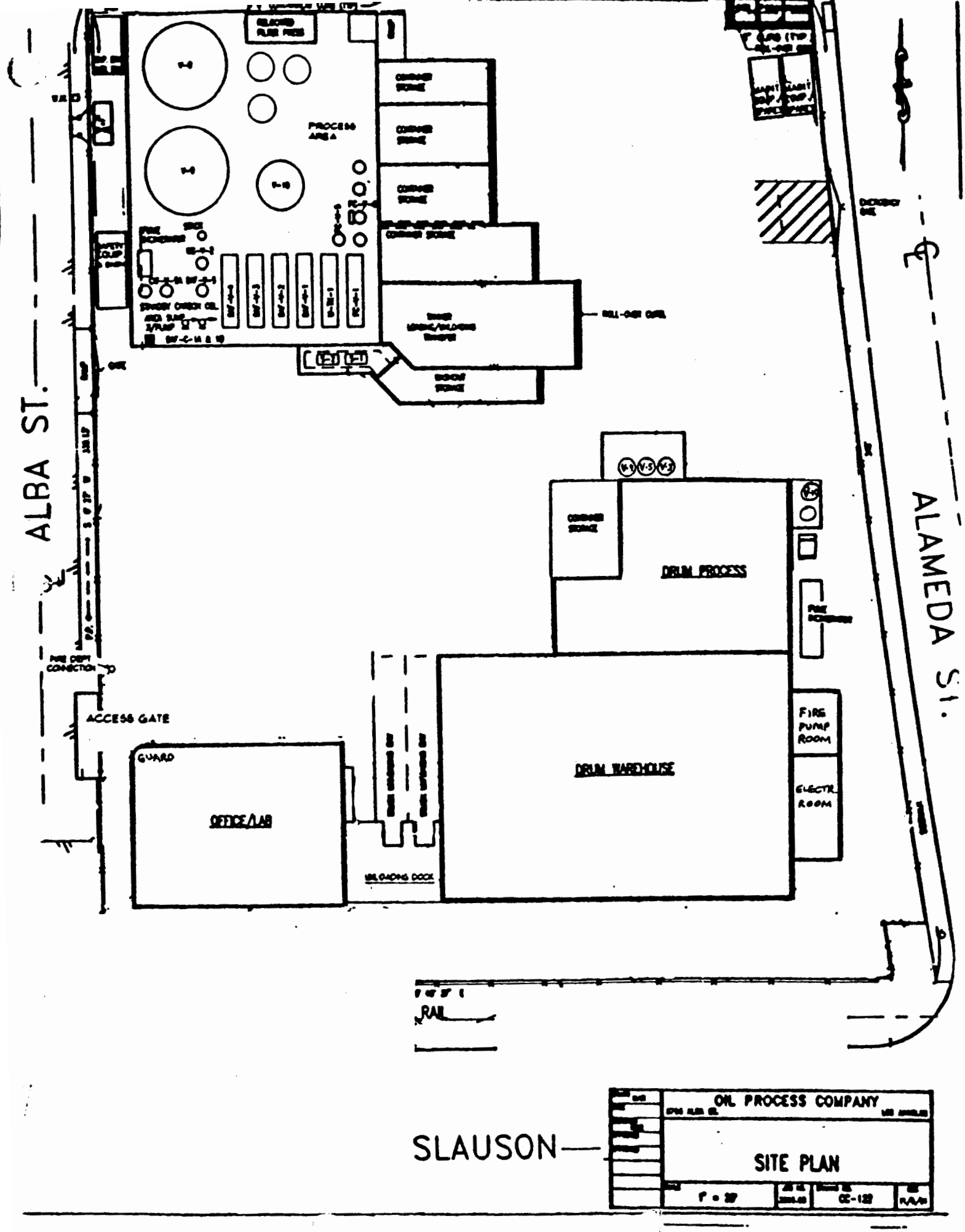
Nov. 21, 1994
Date Submitted

Jim McCammon,
Unit Chief

21 Nov 1994
Date Approved

ATTACHMENT A

Facility Map
(1 Page)



OIL PROCESS COMPANY

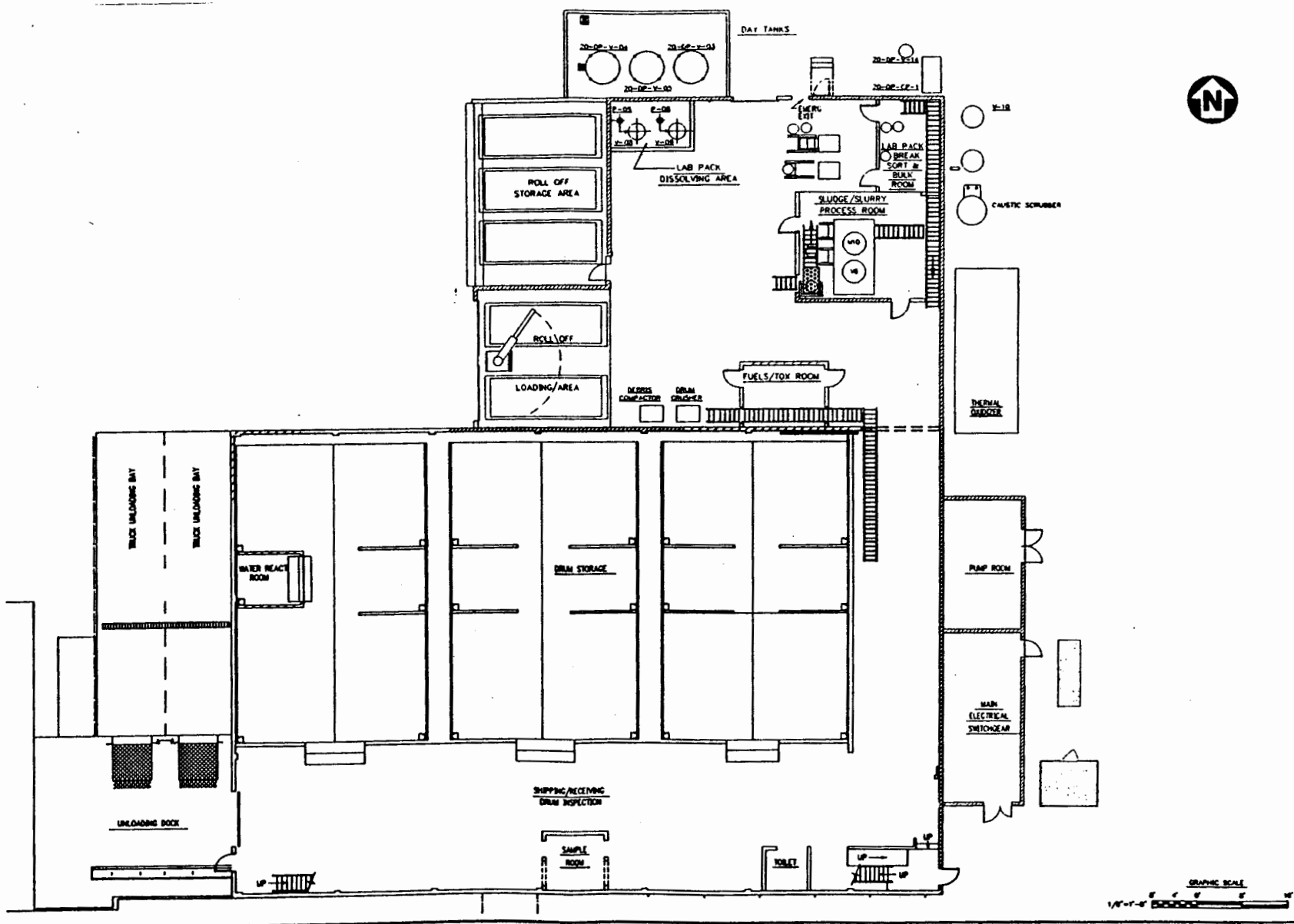
SITE PLAN

1" = 20'

CC-122

ATTACHMENT B

Map of the New Drum Storage Warehouse
(1 page)



NO.	DATE	DESCRIPTION	BY
1	3/10/04	ISSUED FOR PERMIT SUBMITTAL	VVC

REVISIONS

DWG NO.	DESCRIPTION
MP-4	ENLARGED PIPING PLAN-DAY TANK AREA
MP-5	ENLARGED PIPING PLAN-AIR COMPRESSOR AREA
MP-6	ENLARGED PIPING PLAN-FUELS/TOX'S AREA
MP-7	ENLARGED PIPING PLAN-OXIDIZER AREA
MP-12	ENLARGED PIPING PLAN-SLUDGE DEBRIS AREA

REFERENCE DRAWING

Oil Process Company

MARMAC
15631 RED HILL AVENUE
SUITE 200
IRVINE, CALIFORNIA 92649
(714) 250-8000
FAX (714) 250-8300

PROJECT NUMBER 2461

ENGINEER	S.CHALLENGER
DESIGNER	V. CROSE
CAD OPERATOR	VVC
CHECKER	
PROJECT MANAGER	R.STEIN

OIL PROCESS COMPANY

9700 ALBA ST. LOS ANGELES, CALIFORNIA

WASTE HANDLING FACILITY
CONTAINER STORAGE
WAREHOUSE

SCALE 1/8"=1'-0"

PROJECT NUMBER 246

DRAWING NUMBER MP-3

ATTACHMENT C

Photographs #1 - #13
(7 pages)

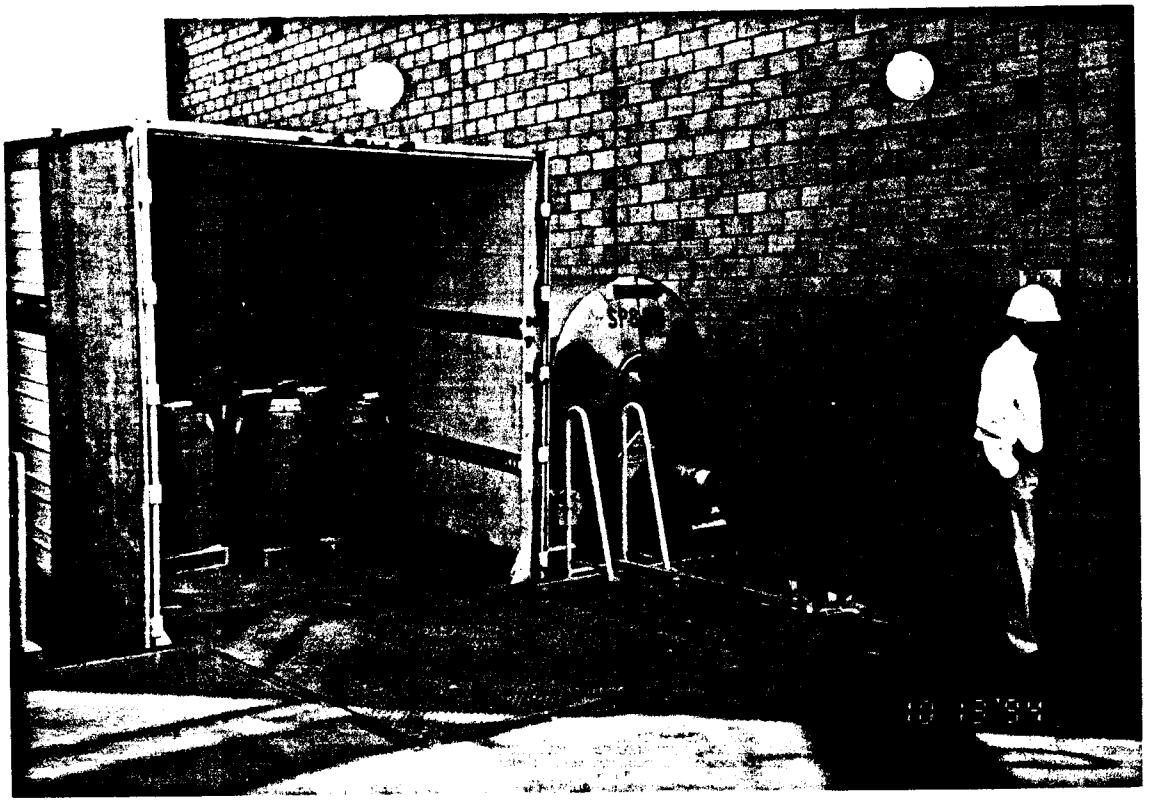


PHOTO #1 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the loading dock to the new container storage warehouse building.

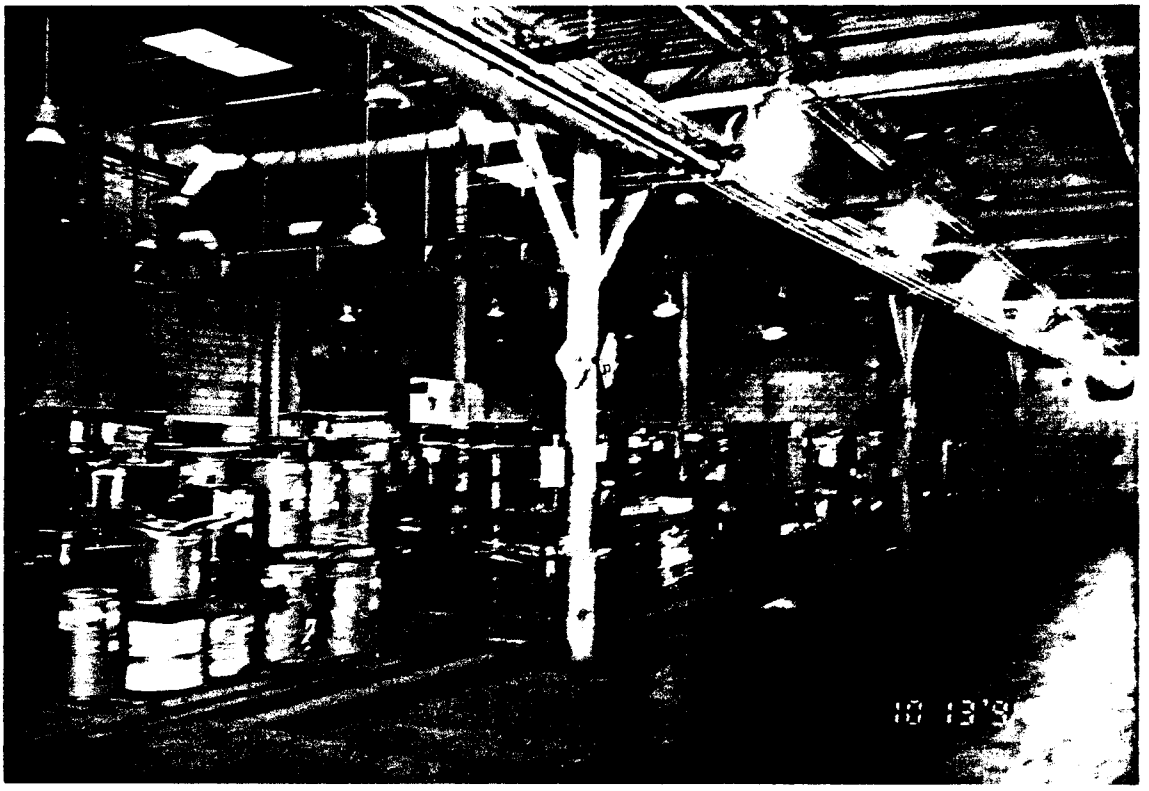


PHOTO #2 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the new container storage warehouse.

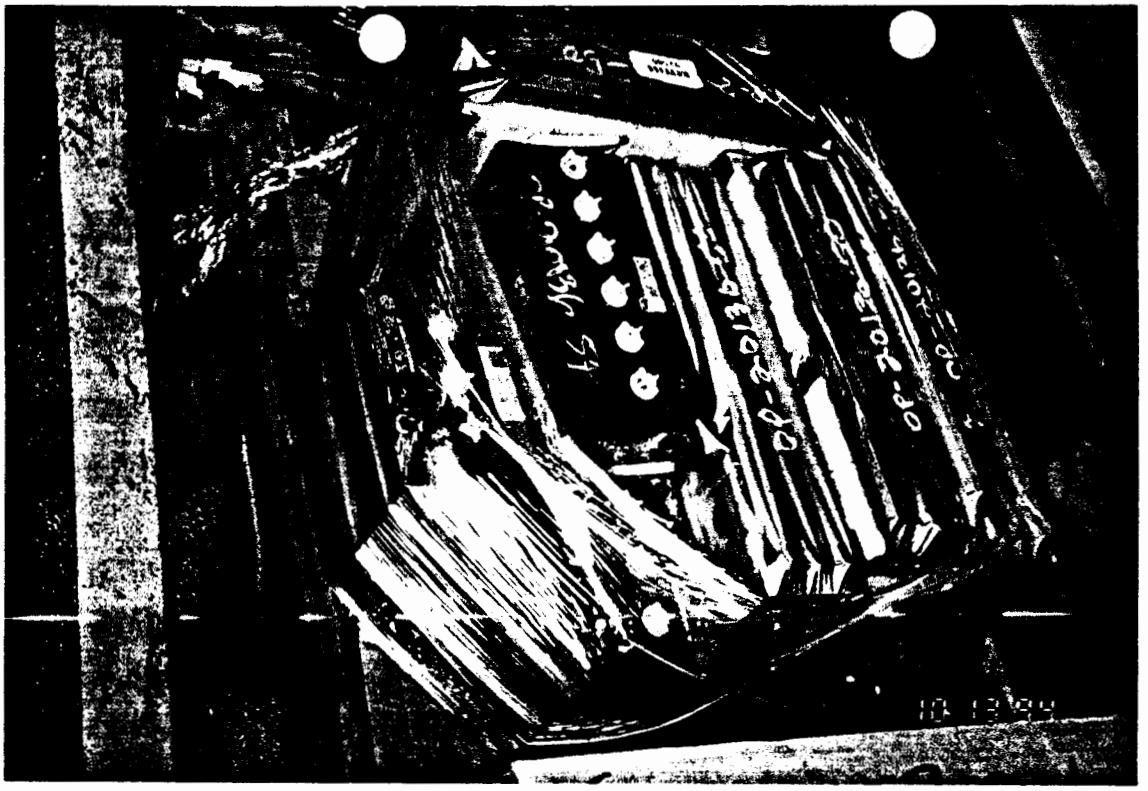


PHOTO #3 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of a pallet containing unlabeled NiCd batteries in the new container storage warehouse.

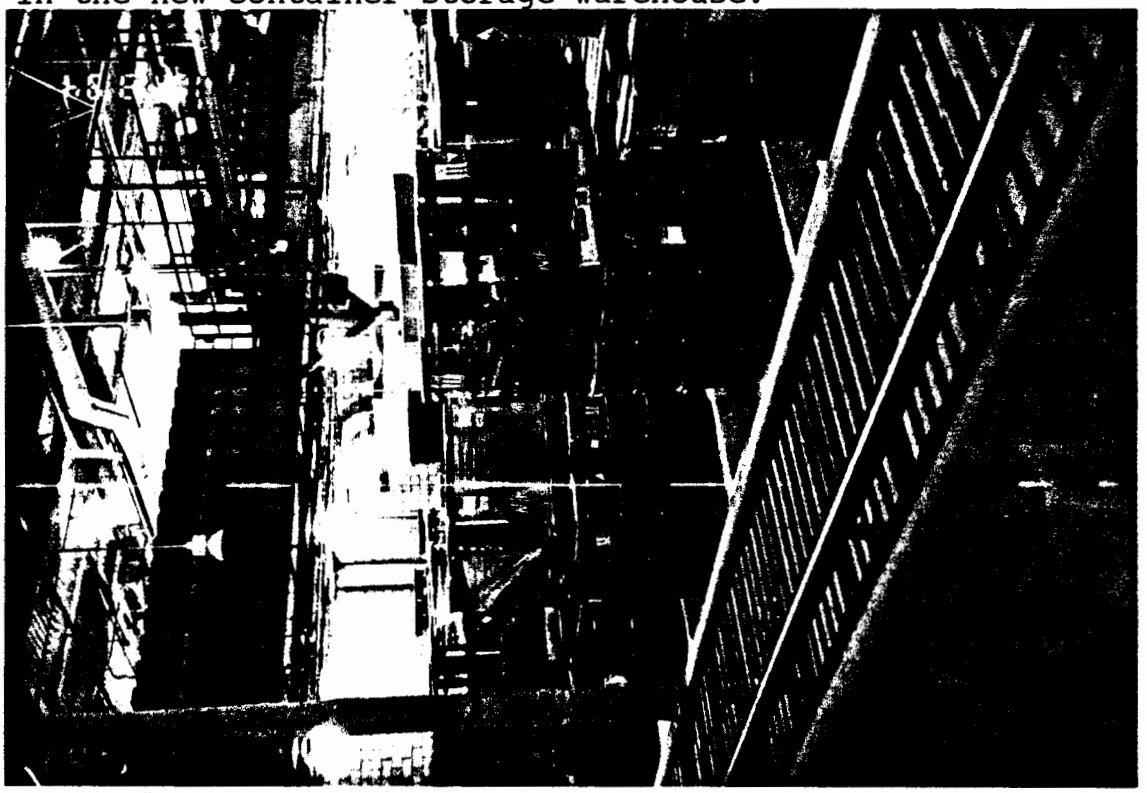


PHOTO #4 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the conveyor system in the new container storage warehouse.

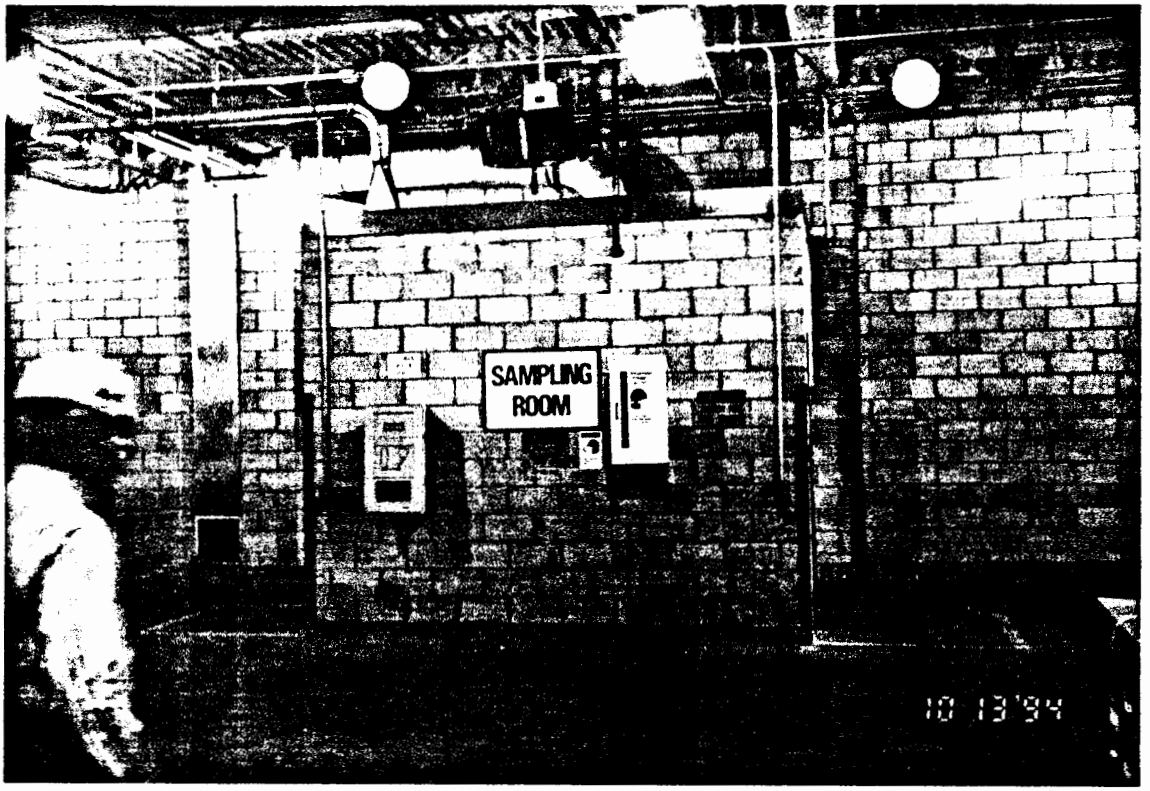


PHOTO #5 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the sampling room in the new container storage warehouse.

PHOTO #6 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of two 55-gallon drums identified as containing ferric chloride filter cake in bay "G" of the temporary drum storage area.

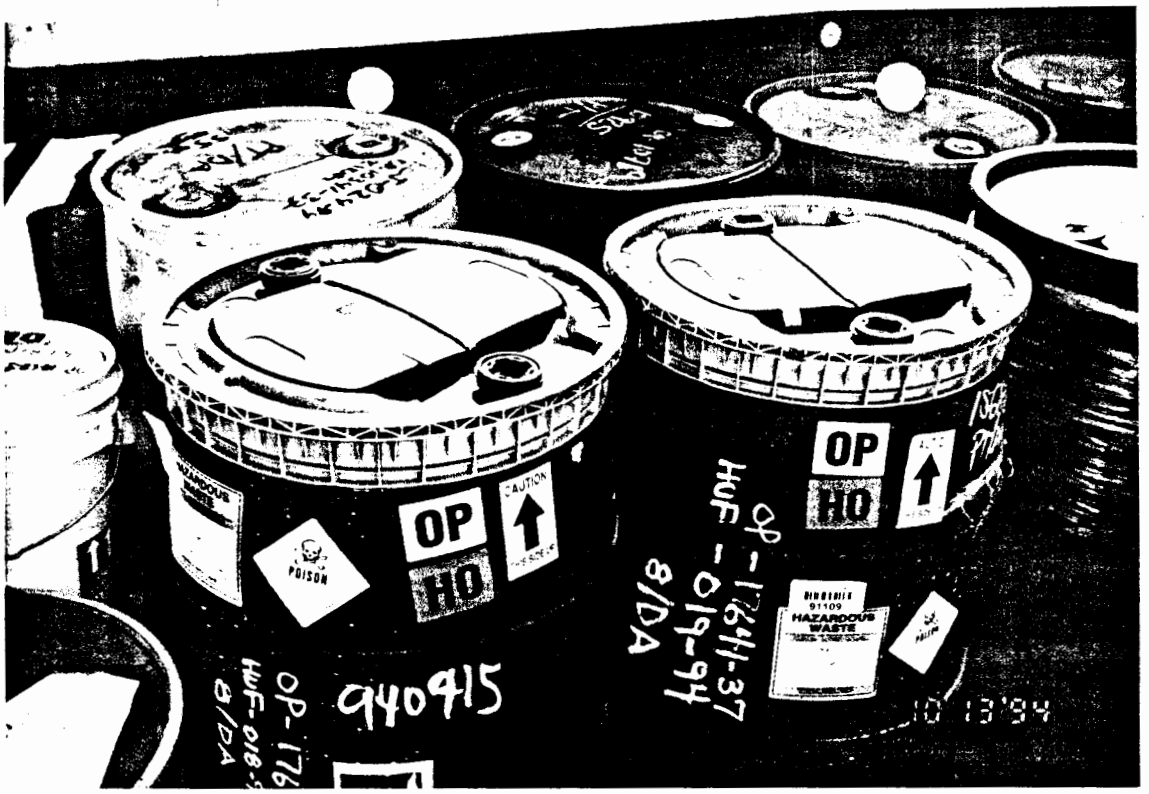


PHOTO #7 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of two 55-gallon containers identified as containing waste sodium cyanide and copper cyanide in the staging bay south of the temporary drum storage area.

PHOTO #8 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the above ground processing tanks in the wastewater treatment area.

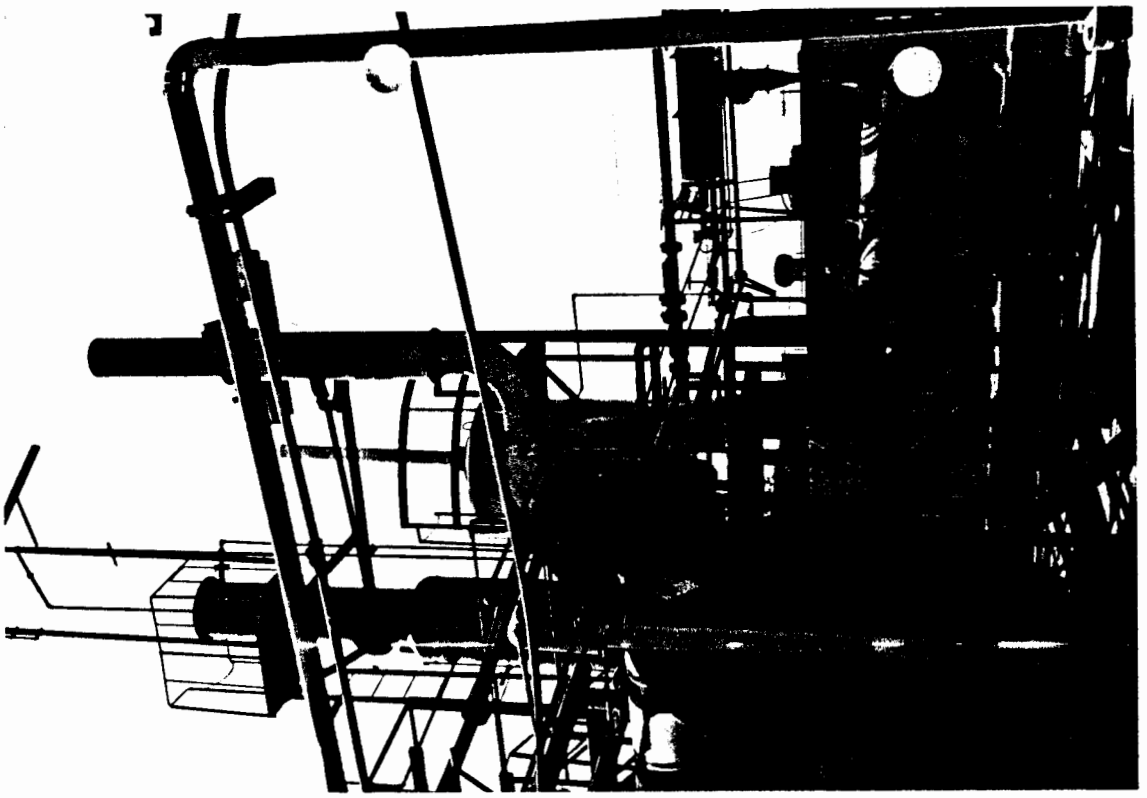


PHOTO #9 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the the caustic scrubber and the charcoal canister.

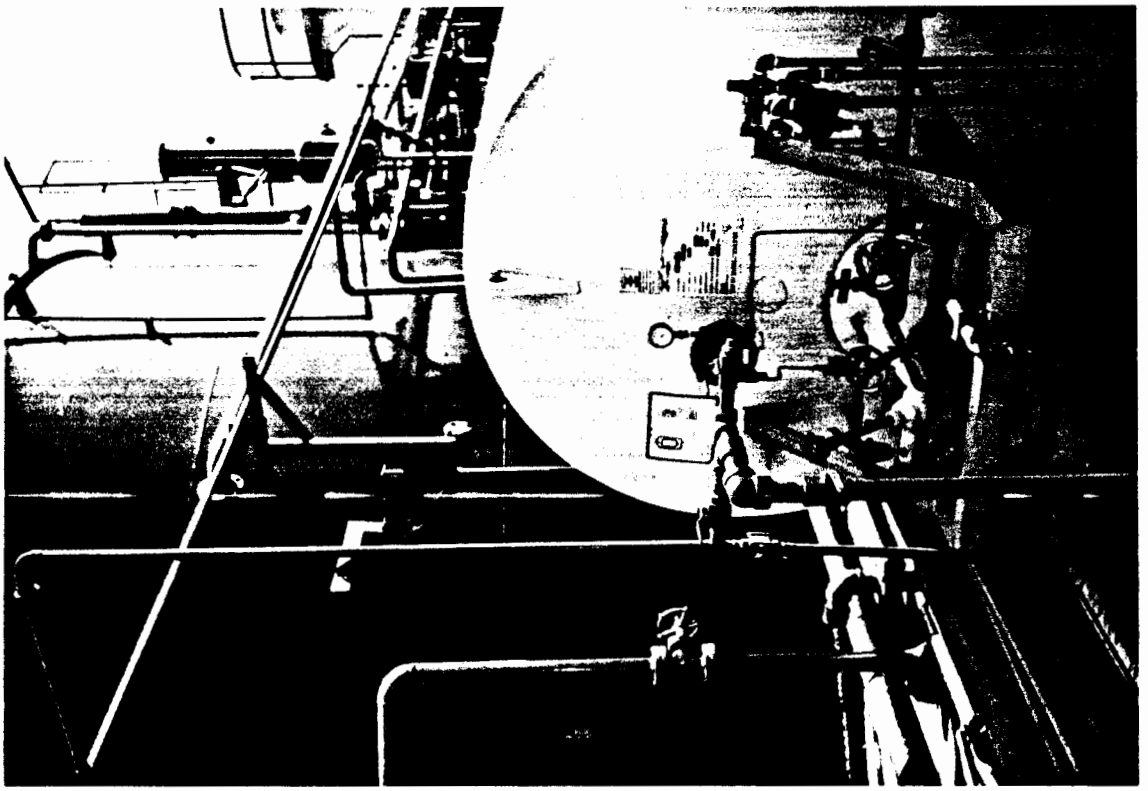


PHOTO #10 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the 600-gallon nitrogen storage tank located behind AST V-10.

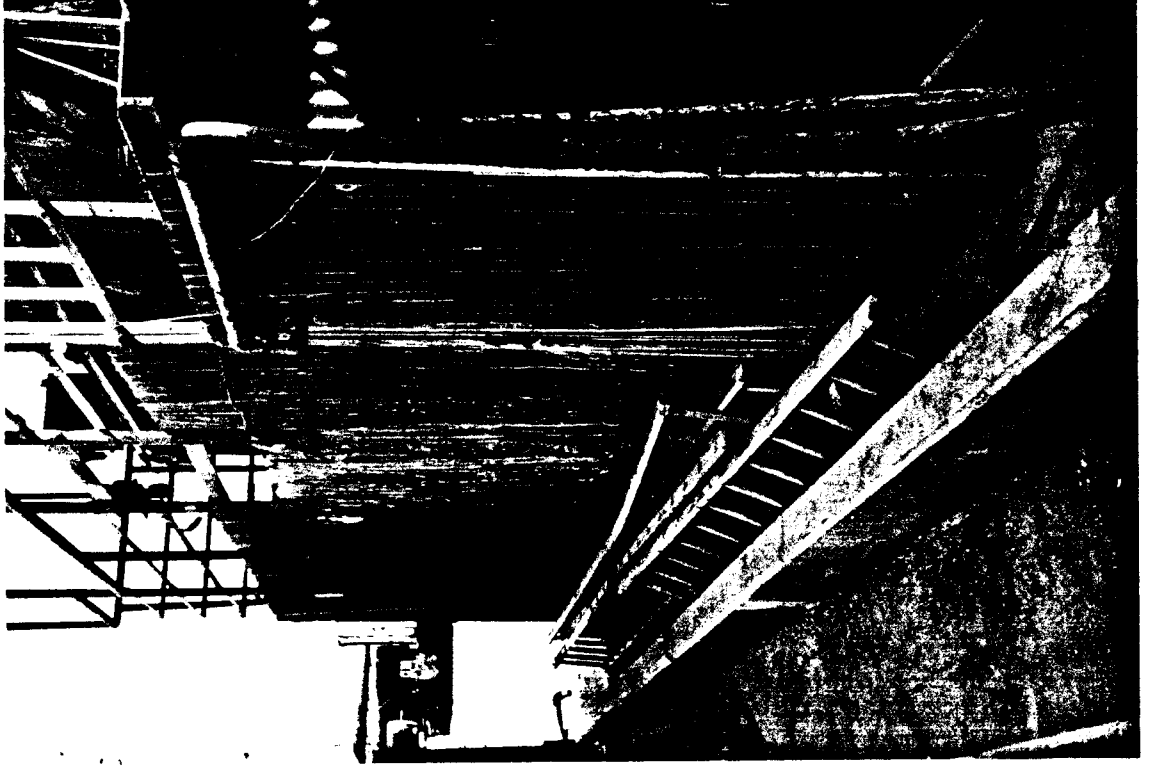


PHOTO #11 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the spilled dry filter cake on the north side of the filter press unit.

PHOTO #12 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of the area and the dry filter sample collected.

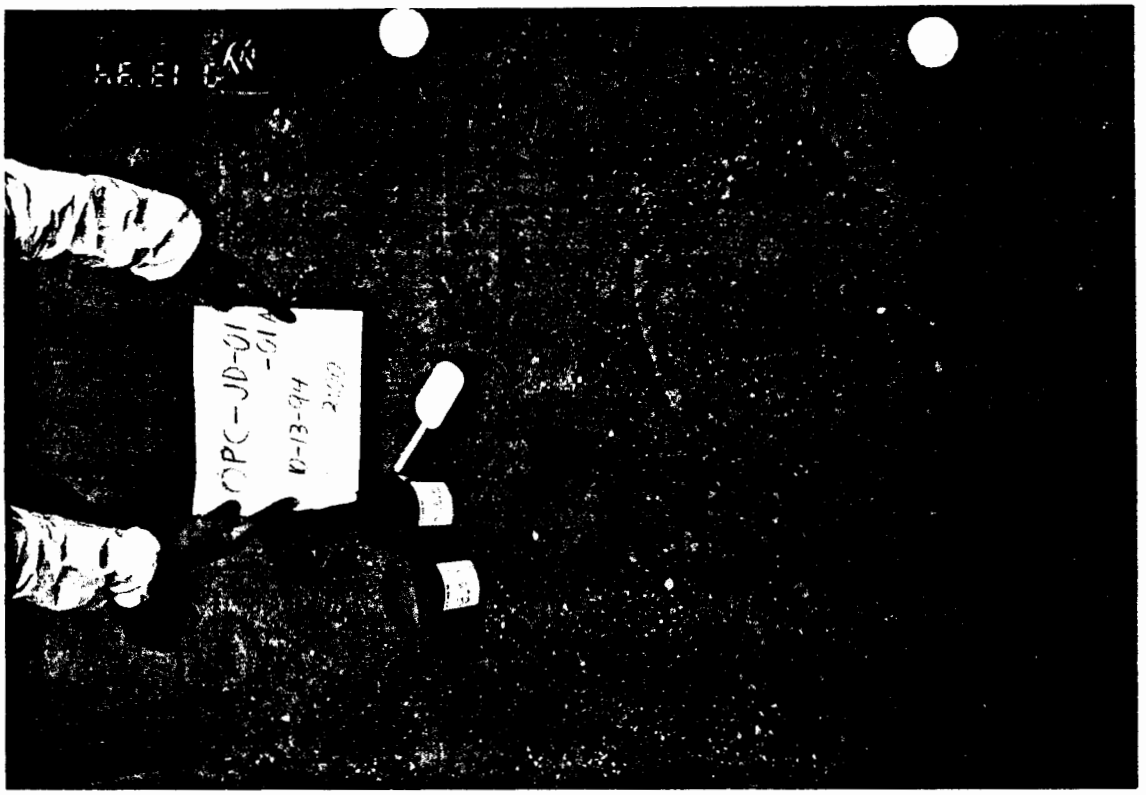


PHOTO #13 DATE: October 13, 1994 PHOTOGRAPHER: Krug

DESCRIPTION: View of sample OPC-JD-01 & -01A.

ATTACHMENT D

Chempak Drum Inventory Sheets
(2 pages)

CUSTOMER SITE: OPC#88046

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

LaJolla Pharmaceutical

Page

Stream #

Drum #

Date:

WASTE TYPE:
☐ Appendix IV/V LP
☐ Non-Appendix LP
☐ Aerosols
☐ Bulk/Specification

☐ PIH Haz Zone:
PIH Description:
☐ Packing Group: II

Chemist/Technician

OSHA Ca...
☐ YES
INFECTIOUS/MEDICAL
☐ YES
ASBESTOS ☐

DRUM TYPE: White 30 PD

☐ 1A1- ☐ 1G- ☐ 1H1-

☐ 1A2- ☐ 4G- ☐ 1H2-

OTHER:

☐ Div. 2.1 ☐ Div. 2.2 ☐ Div. 2.3
☐ Class 3 ☐ Div. 4.1 ☐ Div. 4.2
☐ Div. 4.3 ☐ Div. 5.1 ☐ Div. 5.2
☐ Div. 6.1 ☐ Div. 6.2 ☐ Class 8
☐ Class 9 ☐ Non-Dot/Non-Reg

☐ Lab Pack ☒ Bulk
☐ Kiln ☐ Blend
☐ T-OX ☒ S&E
☐ Repack ☐ PCB
☐ 3rd Party - LOCATION:

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME: Liquid Corrosive N.O.S. UN 2924

WASTE DESCRIPTION		CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	OTHER	COMMENTS
[illegible]								
...anol	15-20 %							
Ethanol	20-25 %							
Isopropanol	20-25 %	71P	30G	D001 D002				
Ammonium Hydroxide	10-15 %							
Sodium Hydroxide	10-15 %							
Water	1-25 %							
pH = 12								

TOTAL WEIGHT ☐ NET ☒ GROSS 210P

APPLY BARCODE HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

USTOMER SITE: Hughes (Fullerton) Page 1 of 1

Stream # OP-17641-37

Drum # HUF-(018-019)-94

Date: 9/26/94

WASTE TYPE:
- ☐ Appendix IV/V LP
- ☐ Non-Appendix LP
- ☐ Aerosols
- ☒ Bulk/Specification

☐ PIH Haz. Zone:
PIH Description:
☒ Packing Group: II

Chemist/Technician: [signature]

OSHA Carcinogen: ☐ YES ☒ NO
INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO
ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:
- ☐ 1A1-
- ☐ 1A2-
- ☐ 1G-
- ☐ 4G-
- ☒ 1H1- 55
- ☐ 1H2-

OTHER:

☐ Div. 2.1 ☐ Div. 2.2 ☐ Div. 2.3
☐ Class 3 ☐ Div. 4.1 ☐ Div. 4.2
☐ Div. 4.3 ☐ Div. 5.1 ☐ Div. 5.2
☐ Div. 6.1 ☐ Div. 6.2 ☒ Class 8
☐ Class 9 ☐ Non-Dot/Non-Reg

☐ Lab Pack ☐ Kiln ☐ T-OX ☐ Repack ☐ 3rd Party - LOCATION:
☒ Bulk (WW) ☐ Blend ☐ S&E ☐ PCB
☐ Reactive ☒ DA ☐ LF ☐ Aerosol

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME: Waste Cyanide Liquids, n.o.s., 8, UN1760, PG II

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Electroplating bath w/ sodium cyanide, copper cyanide, sodium carbonate and water (pH=11)	P	1x50 gal	D002, P030, F007	131		Treat	

2 DRUMS

TOTAL WEIGHT ☐ NET ☒ GROSS 500P

APPLY BARCODE HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

IP-80-005 Rev. 9/93

ATTACHMENT E

Split Sample Receipt
(1 page)

STATE OF CALIFORNIA — CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
1011 N. GRANDVIEW AVENUE
GLENDALE, CA 91201
(818) 551-2800

SPLIT SAMPLE RECEIPT

Received from representatives of the Department of Toxic Substances Control on 10-13-94, a requested sample split from samples acquired under the authority of Section 66272.1, Title 22, California Code of Regulations.

The samples are numbered as follows:

1.	OPC-JD-01	6.	
2.		7.	
3.		8.	
4.		9.	
5.		10.	

Signatures:

Wilfred Nabuzoka
Facility Representative (print and sign)

Jose' Diaz
DTSC Representative (print and sign)

ATTACHMENT F

Financial Requirements
(6 pages)

ROLLINS
ENVIRONMENTAL SERVICES

June 20, 1994

Scott Simpson
California Environmental Protection Agency
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, CA 91201

Dear Mr. Simpson:

Re: Update Closure Cost Estimate
Rollins OPC Inc.
EPA I.D. #CAD050806850

Enclosed you will find our updated closure cost estimate. The closure plan has been revised to account for the completion and activation of the new container storage and process buildings.

Our current estimated closure cost for existing and new units is $375,672 (adjusted for inflation at 2.7%). Our current financial assurance letter of credit is $359,256. Pursuant to Title 22, CCR section 66264.143(a)(2), the trust agreement and the letter of credit shall be updated to reflect the current closure cost estimate within 60 days of this notification. We have also enclosed copies of our financial responsibility documents.

I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, and accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for a known violation.

Should you have any questions, please contact me at 213-585-5063.

Sincerely,

William J. Mitzel
President

SOUTHERN CALIFORNIA BANK

ADMENDMENT #4

September 23, 1994

Toxic Substances Control Division
Department of Health Services
714/744 P. Street
Sacramento, California 92814

Re: Rollins O.P.C., Inc.
5756 Alba Street
Los Angeles, California 90058
Our Letter of Credit #422-85-27
$359,256.00

Gentlemen:

Please be advised that our Letter of Credit No. 422-85-27 dated March 29, 1985, is hereby amended as follows:

Amount increased to ***$386,028.00***
Three Hundred Eighty-Six Thousand and Twenty-Eight Dollars and No/100.

All other terms and conditions shall remain unchanged.

Sincerely,

Peggy J. Rudderow,
Senior Vice President
Senior Credit Administrator

PJR:po

...ST AGREEMENT STANDBY TRUST

SAMPLE SCHEDULE A

...s Agreement demonstrates financial assurance for the following cost estimate(s) for the following facility(es), TTUs

Hazardous Waste Facility TTU Identification Number	Name of Facility/TTU	Address of Hazardous Waste Facility/TTU	Cost Estimates for Which Financial Assurance Being Demonstrated by this Agreement
CAD050806850	Rollins O.P.C. Inc. DBA Rollins O.P.C.	5756 Alba Street Los Angeles, CA 90058	Closure $386,028.00 Postclosure 0.00 Total $386,028.00

The cost estimates listed here were last adjusted on (date) August 2, 1994

...s Agreement demonstrates financial assurance for liability coverage for the following facility(ies), TTUs

Hazardous Waste Facility TTU Identification Number	Name of Facility/TTU	Address of Hazardous Waste Facility/TTU	Liability Coverage Being Demonstrated by this Agreement
			Sudden occurrence per occurrence: Annual aggregate: Nonsudden occurrence per occurrence: Annual aggregate: Total aggregate:

The liability coverage listed here is effective on (date) _____

SAMPLE SCHEDULE B

The fund is established initially as consisting of the following

$ 1.00 . One Dollars and No Cents as evidenced by
(Insert Dollar Amount)

Continental Bank N.A. Check Number 000682 .
(Name of Issuing Institution)

dated 4/26/91 .

I hereby certify that funds have been received and deposited.

Authorized Signature	Title Vice President
Typed or Printed Name of Person Signing	Address 231 S. LaSalle St Chicago, IL 60697

STANDBY TRUST AGREEMENT (ONLY)

SAMPLE SCHEDULE B

List of Property Comprising Trust Fund

None at the time of trust establishment. Funding of this Standby Trust Agreement is contingent upon drafts against that primary, Letter of Credit number 422-85-27 and issued by the Southern California Bank on 3/29/85 in accordance with the terms of that Letter of Credit .
(Surety Bond or Letter of Credit) (Surety Institution) (Date) (Surety Bond or Letter of Credit)

EXHIBIT A

TRUST AGREEMENT BY AND BETWEEN Rollins O.P.C. Inc.

AND THE Bank of America Illinois (formerly Continental Bank N.A.

As provided for in Section 14 of the Trust Agreement, the persons, other than the officials of the Beneficiary identified in Section 14 of the Trust Agreement, who, until this Exhibit A is amended, shall have the authority to make orders, requests, and instructions to the Trustee are

Officials of the Grantor. Leo F. Rattigan, Jr.

Officials of the Grantor who have authority to give instructions are:

Name(s) Leo F. Rattigan, Jr.

Title(s)

SAMPLE

EXHIBIT A

Any orders, requests or instructions by the Grantor to the Trustee, pursuant to the foregoing Agreement, may be signed by any one of more of the following persons.

Name(s):

Title(s):

ATTACHMENT G

Daily Inspection Logs
(3 pages)

DAILY INSPECTION RECORD OF PROCESSING PLANT EQUIPMENT

DATE: 7-27 19 93 TIME 2-30 pm

EQUIPMENT: AIR POLLUTION CONTROL SYSTEM

EQUIPT NO.	IDLE	IN SERV.	EQUIPMENT SERVICE	TEMP.	REMARKS	
WG-H-1		✓	PLANT FUME INCINERATOR	1600 °F		
>>>>>>>>	>>>>>>	>>>>>>	>>>>>>>>>>>>>>>>>>>>>>>>>>	SOL. FLOW	pH	LEVEL
WG-V-1		✓	WASTE GAS NaOH SCRUBBER	42.1	12	▼▼▼▼▼▼
WG-V-2		✓	NaOH SOLUTION CIRC. TANK	▼▼▼▼▼▼▼▼▼▼	12	50%

▼▼▼▼▼▼▼			▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼▼	ORGANICS (PPM) IN	OUT	REMARKS:
WG-V-3		✓	CARBON BED (TRUCKWASH)	1.0	28	
WG-V-4		✓	CARBON BED (STAND-BY)	—	1.4	
WG-H-1			THERMAL OXIDIZER	56	0.1	

	"W.C	REMARKS:
VAPOR LINE PRESSURE AT V-3 (1/2" W.C MIN.)	4.0	
VAPOR LINE PRESSURE AT V-4 (1/2" W.C MIN.)	2.0	
VAPOR LINE PRESSURE AT TRUCKWASH (1/2" W.C)	1.0	

WG-P-1		✓	FUME INCNTR. FEED GAS BLOWER	
WG-P-2		✓	FUME INCNTR. EXHAUST BLOWER	
WG-P-3		✓	V-1,V-2,&V-3 EXHAUST BLOWER	
WG-P-4		✓	TRUCKWASH AREA EXHST. BLOWER	
WG-P-5A		✓	NaOH SOLUTION CIRC. PUMP	
WG-P-5B	✓		NaOH SOLUTION CIRC. PUMP	

NOTE:

INSPECTOR SIGNATURE: [signature]

- 1550 F MIN. COMBUSTION TEMP.
- 27 GPM MIN. NaOH SOL. FLOW TO WG-V-1

INSPECTION OBSERVATIONS:
- LEAKS AT MANHOLES, CONNECTIONS,& BASE
- BURNER OPERATION & FLAME PATTERN
- REFACTORY WALL & CONDITION OF INSULATION

DAILY INSPECTION RECORD OF PROCESSING PLANT EQUIPMENT

DATE: 7-23 19 93   TIME 18:00

EQUIPMENT: AIR POLLUTION CONTROL SYSTEM

EQUIPT NO.	IDLE	IN SERV.	EQUIPMENT SERVICE	TEMP.	REMARKS		
WG-H-1		X	PLANT FUME INCINERATOR	1600°F			
>>>>>>>>	>>>>>>>	>>>>>>	>>>>>>>>>>>>>>>>>>>>>>>>>	SOL. FLOW	pH	LEVEL	50%
WG-V-1		X	WASTE GAS NaOH SCRUBBER	41.5	11.6	vvvvvv	
WG-V-2		X	NaOH SOLUTION CIRC. TANK	vvvvvvvvvv			

EQUIPT NO.	IDLE	IN SERV.	EQUIPMENT SERVICE	ORGANICS (PPM) IN	ORGANICS (PPM) OUT	REMARKS:
WG-V-3		X	CARBON BED (TRUCKWASH)	—	—	
WG-V-4		X	CARBON BED (STAND-BY)	—	—	
WG-H-1		X	THERMAL OXIDIZER	—	—	

	"W.C	REMARKS:
VAPOR LINE PRESSURE AT V-3 (1/2" W.C MIN.)	2.0	
VAPOR LINE PRESSURE AT V-4 (1/2" W.C MIN.)	.6	
VAPOR LINE PRESSURE AT TRUCKWASH (1/2" W.C)	5.0	

EQUIPT NO.	IDLE	IN SERV.	EQUIPMENT SERVICE	REMARKS
WG-P-1		X	FUME INCNTR. FEED GAS BLOWER	
WG-P-2		X	FUME INCNTR. EXHAUST BLOWER	
WG-P-3		X	V-1,V-2,&V-3 EXHAUST BLOWER	
WG-P-4		X	TRUCKWASH AREA EXHST. BLOWER	
WG-P-5A		X	NaOH SOLUTION CIRC. PUMP	
WG-P-5B	X		NaOH SOLUTION CIRC. PUMP	

NOTE:
- 1550 F MIN. COMBUSTION TEMP.

INSPECTOR SIGNATURE: [signature]
- 27 GPM MIN. NaOH SOL. FLOW TO WG-V-1

INSPECTION OBSERVATIONS:
- LEAKS AT MANHOLES, CONNECTIONS,& BASE
- BURNER OPERATION & FLAME PATTERN
- REFACTORY WALL & CONDITION OF INSULATION

WASTE CONTAINER STORAGE AREA INSPECTION REPORT

INSPECTED BY: A. Gude TIME: 7:30 DATE: 7/20/93

1. Is DIKED STORAGE AREA concrete free of cracks/breaks/leaks?. . . . . (YES)/NO
2. Is CANOPY free of structural deterioration?. . . . . (YES)/NO
3. Are the CANOPY legs (wheels) securely anchored?. . . . . (YES)/NO
4. Is adequate AISLE SPACE (24-inches) present between drums? . . . . . (YES)/NO
5. Is each Container Storage Area free of PUDDLED LIQUIDS?. . . . . (YES)/NO
6. Is area around DRUM CRUSHER free from spills/debris? . . . . . (YES)/NO
7. Is area around Dike free from debris? . . . . . (YES)/NO
8. Are CRUSHED DRUM, LF & TX ROLLOFF BOXES covered? . . . . . (YES)/NO
9. Is an empty SALVAGE DRUM and absorbent nearby (Spill-Kit)? . . . . . (YES)/NO
10. Are all DRUMS in Storage Area
    - (A) Tightly Closed?. . . . . (YES)/NO
    - (B) Free From Sever Rusting? . . . . . (YES)/NO
    - (C) Free From Bulging? . . . . . (YES)/NO
    - (D) Free From Leaks? . . . . . (YES)/NO
    - (E) Stored On Pallets? . . . . . (YES)/NO
11. Are all DRUMS marked with a
    - (A) Hazardous Waste Label? . . . . . (YES)/NO
    - (B) With Their Contents? . . . . . (YES)/NO
    - (C) Are Labels Visible?. . . . . (YES)/NO
    - (D) OPC Received Date? . . . . . (YES)/NO
12. Are all DRUMS segregated by hazard class?. . . . . (YES)/NO
13. Are all DRUMS that contain waste stored in dike area?. . . . . YES/(NO)
14. Do STORAGE AREA PLACARDS properly describe waste contained?. . . . . (YES)/NO
15. Is the DAILY DRUM INVENTORY completed and posted?. . . . . (YES)/NO
16. Has the DRUM STORAGE TRAILER been Inspected/Inventoried today? . . . . (YES)/NO
17. Is a TELEPHONE easily accessible and working for emergencies?. . . . . (YES)/NO
18. Is PERSONAL PROTECTIVE EQUIPMENT (P.P.E.) available nearby?. . . . . (YES)/NO
19. Are the EYEWASH/SHOWERS in working condition?. . . . . (YES)/NO
20. Are the (6) FIRE EXTINGUISHERS accessible/charged/sealed?. . . . . (YES)/NO
    (Fire-Extinguisher Numbers 17,18,19,22,23,24)

If any of these items are marked (NO), list item # with comments and corrective actions taken by person submitting inspection.

WASTE CONTAINER STORAGE AREA INSPECTION REPORT

INSPECTED BY: AC TIME: 4:00 PM DATE: 7-30-93

1. Is DIKED STORAGE AREA concrete free of cracks/breaks/leaks? . . . . . (YES)/NO
2. Is CANOPY free of structural deterioration/wheels securely anchored? . . . . . (YES)/NO
3. Is adequate AISLE SPACE (24-inches) present between drums? . . . . . (YES)/NO
4. Is each Container Storage Area and Drum Crusher Area free of PUDDLED LIQUIDS? . . . . (YES)/NO
8. Is an empty SALVAGE DRUM and absorbent nearby (Spill-Kit)? . . . . . (YES)/NO
9. Are all DRUMS in Storage Area
   (A)Tightly Closed? . . . . . (YES)/NO
   (B)Free From Sever Rusting? . . . . . (YES)/NO
   (C)Free From Bulging? . . . . . (YES)/NO
   (D)Free From Leaks? . . . . . (YES)/NO
   (E)Stored On Pallets? . . . . . (YES)/NO
10. Are all DRUMS marked with a
   (A)Hazardous Waste Label? . . . . . (YES)/NO
   (B)With Their Contents? . . . . . (YES)/NO
   (C)Are Labels Visible? . . . . . (YES)/NO
   (D)OPC Received Date? . . . . . (YES)/NO
11. Are all DRUMS segregated by hazard class? . . . . . (YES)/NO
12. Are all DRUMS that contain waste stored in dike area? . . . . . (YES)/NO
13. Do STORAGE AREA PLACARDS properly describe waste contained? . . . . . (YES)/NO
14. Is the DAILY DRUM INVENTORY completed and posted? . . . . . (YES)/NO
16. Is a TELEPHONE easily accessible and working for emergencies? . . . . . (YES)/NO
17. Is PERSONAL PROTECTIVE EQUIPMENT (P.P.E.) available nearby? . . . . . (YES)/NO
18. Are the EYEWASH/SHOWERS in working condition? . . . . . (YES)/NO
19. Are the (6) FIRE EXTINGUISHERS accessible/charged/sealed? . . . . . (YES)/NO
    (Fire-Extinguisher Numbers 17,18,19,22,23,24)

Bulk Liquid/Rolloff Container Area

1. Are VACUUM TRAILERS/ROLLOFFS free of any new DAMAGE? . . . . . (YES)/NO
2. Are bulk liquid or rolloff CONTAINMENT AREAS free of LEAKS/SPILLS? . . . . . (YES)/NO
3. Are all trailer HATCHES and CAPS secured? . . . . . (YES)/NO
4. Are CRUSHED DRUM, LF & TX ROLLOFF BOXES securely tarped? . . . . . (YES)/NO
4. Are yard VACUUM HOSES in good CONDITION/SAFE and free of tears or smashed sections? (YES)/NO
5. Are proper MANIFESTS and/or LABELS attached to all loaded trailers and rolloffs? . (YES)/NO
   Are manifests signed off by OPC? . . . . . (YES)/NO
   Are Accumulation Start Dates on labels? . . . . . (YES)/NO
   Is load going to another TSD? . . . . . (YES)/NO
   Has it been here for more than 6 days? . . . . . (YES)/NO
6. Are all loaded trailers and rolloffs properly PLACARDED? . . . . . (YES)/NO
7. Is containment area and yard free from SPILLS/DEBRIS (pails, pallets, trash)? . . . . (YES)/NO
9. Has the DAILY INVENTORY/RECEIVING log been completed and posted? . . . . . (YES)/NO

If any items are marked (NO), list item # with comments and corrective actions taken by inspector.

_____

_____

WASTE CONTAINER STORAGE AREA INSPECTION REPORT

Inspected By OSCAR Time: 11:00 Date: 10-13-94

1. Is DIKED STORAGE AREA concrete free ofcracks/breaks/leaks?.....(Yes)/No

2. Is adequate AISLE SPACE (24-inches) present between drum?.....(Yes)/No

3. Is each CONTAINER STORAGE AREA AND DRUM CRUSHER AREA free of Rainwater?(Yes)/No

4. Is an empty SALVAGE DRUM and absorbent nearby (Spill-Kit)?.....(Yes)/No

5. Are all DRUMS in storage area
   (A) Tightly Closed.....(Yes)/No
   (B) Free From Sever Rusting?.....(Yes)/No
   (C) Free From Bulging?.....(Yes)/No
   (D) Free From Leaks?.....(Yes)/No
   (E) Stored on Pallets?.....(Yes)/No

6. Are all DRUMS marked with a
   (A) Hazardous Waste Label?.....(Yes)/No
   (B) With Their Contents?.....(Yes)/No
   (C) Are Labels Visible?.....(Yes)/No
   (D) OPC Received Date ?.....(Yes)/No

7. Are all DRUMS segregated by hazard class?.....(Yes)/No

8. Are all DRUMS that contain waste stored in dike area?.....(Yes)/No

9. Do STORAGE AREA PLACARDS properly describe waste contained?.....(Yes)/No

10. Is a Portable Radio or a Telephone easily accessible and working for emergencies.....(Yes)/No

11. Is PERSONAL PROTECTIVE EQUIPMENT (PPE) available nearby?.....(Yes)/No

12. Are the EYEWASH/SHOWERS in working condition?.....(Yes)/No

13. Are the (6) FIRE EXTINGUISHERS accessible/charged/sealed?.....(Yes)/No
    (Fire-Extinguishers Numbers 17,18,19,22,23,24)

BULK LIQUID/ROLLOFF CONTAINER AREA

1. Are bulk liquid or rolloff CONTAINMENT AREAS free of Leaks/Spills?..(Yes)/No

2. Are all trailer HATCHES and CAPS secured?.....(Yes)/No

3. Are all ROLLOFFS CONTAINERS:
   (A) Securely Tarped?.....(Yes)/No
   B) Has more than one Hazardous Waste Labels?.....(Yes)/No
   (C) Hazardous Waste Labels properly identified the content of the container?.....(Yes)/No

4. Are yard VACUUM HOSES in good CONDITION/SAFE and free of tears or smashed sections.....(Yes)/No

********** PLEASE TURNOVER PAGE - CONTINUE ON OTHER SIDE. **********

5. Are proper MANIFEST and/or Labels attached to all loaded trailers and rolloffs?.....(Yes)/No
Are manifest signed off by OPC?.....(Yes)/No
Are Accumulation Start Dates on labels?.....(Yes)/No
Is load going to another TSD?.....Yes/(No)
Has it been here for then 6 days?.....Yes/(No)

6. Are all loaded trailers and rolloffs properly PLACARDED?.....(Yes)/No
7. Is containment area and yard free from SPILLS/DEBRIS (pails,pallets,trash)?.....(Yes)/No

If any items are marked (No), list item # with comments and corrective actions taken by inspector.

_____

_____

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DAILY INSPEC'''ON RECORD OF PROCESSING P' ANT EQUIPMENT

DATE. 1013 1994 TIME 22:30

EQUIPMENT: AIR POLLUTION CONTROL SYSTEM

EQUIPT NO.	IDLE	IN SERV.	EQUIPMENT SERVICE	TEMP.	REMARKS		
WG-H-1		✓	PLANT FUME INCINERATOR	1600°F			
>>>>>>>	>>>>>>	>>>>>>	>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	SOL. FLOW	pH	LEVEL	45%
WG-V-1		✓	WASTE GAS NaOH SCRUBBER	45.0	13.0	vvvvvv	
WG-V-2		✓	NaOH SOLUTION CIRC. TANK	vvvvvvvvvv			

EQUIPT NO.	IDLE	IN SERV.	EQUIPMENT SERVICE	ORGANICS (PPM) IN	ORGANICS (PPM) OUT	REMARKS:
vvvvvvv vvvvvvv vvvvvvv			vvvvvvvvvvvvvvvvvvvvvvvvvv vvvvvvvvvvvvvvvvvvvvvvvvvv vvvvvvvvvvvvvvvvvvvvvvvvvv	IN	OUT	
WG-V-3		✓	CARBON BED (TRUCKWASH)			
WG-V-4		✓	CARBON BED (STAND-BY)			

	"W.C	REMARKS:
VAPOR LINE PRESSURE AT V-3 (1/2" W.C MIN.)	0.9	
VAPOR LINE PRESSURE AT V-4 (1/2" W.C MIN.)	0.7	
VAPOR LINE PRESSURE AT TRUCKWASH (1/2" W.C)	6.0	

EQUIPT NO.	IDLE	IN SERV.	EQUIPMENT SERVICE	REMARKS
WG-P-1		✓	FUME INCNTR. FEED GAS BLOWER	
WG-P-2		✓	FUME INCNTR. EXHAUST BLOWER	
WG-P-3	—	—	V-1,V-2,&V-3 EXHAUST BLOWER	REPLACED BY WG-P-4
WG-P-4		✓	TRUCKWASH AREA EXHST. BLOWER	
WG-P-5A		✓	NaOH SOLUTION CIRC. PUMP	
WG-P-5B	✓		NaOH SOLUTION CIRC. PUMP	

NOTE: INSPECTOR SIGNATURE: [signature]

- 1550 F MIN. COMBUSTION TEMP.
- 27 GPM MIN. NaOH SOL. FLOW TO WG-V-1

INSPECTION OBSERVATIONS:

- LEAKS AT MANHOLES, CONNECTIONS, & BASE
- BURNER OPERATION & FLAME PATTERN
- REFACTORY WALL & CONDITION OF INSULATION

ATTACHMENT H

Preliminary Incident Report
(3 pages)

DISTRIBUTION:

Report # 1
(ISSUED BY SAFETY DEPT.)

ROLLINS ENVIRONMENTAL SERVICES - OPC
PRELIMINARY INCIDENT INVESTIGATION REPORT

(Items 1 through 15 to be completed within 24 hours or end of shift when incident occurred)

1. RES Company OPC 2. Incident Type: ☐ Injury/Illness ☐ Property Damage ☒ Environmental Release ☐ Near-miss
3. Date: 10-12-94 Time: 8:45 ☐ a.m. ☒ p.m. 4. Department: PLANT OPERATIONS
5. Supervisor in charge: OSCAR GALLEGOS
6. Location of incident: WATER TREATMENT - FILTER CAKE PROCESS AREA.
7. Personnel involved: JESUS UELA, MIGUEL GODOY
8. Nature of injury/illness (if applicable): NONE
9. Equipment or tools involved (if applicable): NONE
10. Detailed description of events of the incident in chronological order (additional space on back): WHEN REMOVING ROLL-OFF CONTAINER FROM FILTER CAKE PRESS, APPROX 5 TO 10 GALS OF MATERIAL SPILLED ONTO GROUND. MATERIAL WAS CONTAINED & PICKED UP, FOLLOW-UP CLEAN UP TO BE COMPLETED ON 1ST SHIFT. 11-13-94
11. Witnesses (Name/Company): JESUS UELA, MIGUEL GODOY, OSCAR GALLEGOS
12. Preliminary Summary: Incident resulted from (Check all that apply):
☐ Unsafe Act ☐ Unauthorized Work ☐ Unsafe Condition ☐ Failure to use P.P.E.
☐ Procedural Violation ☒ Equipment Failure ☐ External Condition
☐ other (Explain):
13. Does employee or personnel involved have a history of similar incidents or incidents due to similar causes? ☐ Yes ☒ No
14. Interim safety measures taken to prevent recurrence: CLEANED OUT FILTERS ON 10-12-94
15. Investigated by: Jorge Magana Jr Title: OPERATION SUPERVISOR
16. Preliminary report issue time: 7AM ☒ a.m. ☐ p.m.

RETURN COMPLETED FORM TO THE SAFETY OFFICE FOR DISTRIBUTION

INCIDENT INVESTIGATION TEAM FOLLOW-UP REPORT

17. Root Cause(s) (i.e. that single cause which if corrected would prevent recurrence of this and similar incidents) Choose one:

- ☐ attention diverted (distracted)
- ☒ equipment problem
- ☐ no SOP or inadequate/defective SOP
- ☐ personnel error
- ☐ client error
- ☐ external phenomenon (e.g., power failure, weather, theft)
- ☐ other (Explain) [additional space on back): _____
- ☐ personal protective equipment not available/not used
- ☐ training deficiencies (circle one or more):
  - no training - refresher training needed
  - inadequate training - insufficient hands-on experience
- ☐ reduced stamina/acuity (i.e., tired, ill, long hours, etc.)

18. Contributing Cause(s) (i.e. the cause(s) that contributed to the incident but by itself would not have caused the incident.) (Choose one or more):

- ☐ attention diverted (distracted)
- ☒ equipment problem
- ☐ no SOP or inadequate/defective SOP
- ☐ personnel error
- ☐ management problem (e.g., too much overtime, poor supervision, planning deficiency, policy not explained, etc.)
- ☐ other (Explain) [additional space on back]: _____
- ☐ personal protective equipment not available/not used
- ☐ training deficiencies (circle one or more):
  - no training - refresher training needed
  - inadequate training - insufficient hands-on experience

19. Management System Cause(s) (Choose one or more):

- ☐ inadequate administrative control
- ☐ inadequate supervision
- ☐ work organization/planning deficiency (e.g., too much overtime)
- ☐ other (Explain) [additional space on back]: _____
- ☐ policy not adequately defined, disseminated, or enforced
- ☐ insubstantial resource allocation

20. Recommended Corrective Action(s):

ACTION (ADDITIONAL SPACE ON BACK)	RESPONSIBLE PERSON	TIME TO COMPLETION
clean FILTERS ON PRESS, unclog FILTER TO	JESUS VELA	10-19-94
AVOID LIQUID BUILDING UP IN FILTER HOP.		

COMPLETED BY SAFETY DEPARTMENT. The Injury/Illness has been classified as OSHA: ☐ Lost Time ☐ Restricted Duty ☒ Not applicable (Not an Injury or Illness) ☐ Medical Treatment ☐ Non-OSHA First Aid

Date of Report: _____ Investigated by/Title: _____

Concurrence: _____ _____ ☐ Yes ☐ No (see comment)
Safety Manager Date

Comment: _____

I approve of the above investigation and recommended corrective action:

_____ _____ _____ _____
Yes No Plant Manager or Designee Date

Comments: _____

RETURN COMPLETED FORM TO THE SAFETY OFFICE FOR DISTRIBUTION

Rolling OPC inc.

Corrective Action Report

1.Date Reported: 10-12-94

2.Item reported on weekly inspection report:

filter press cartriges plugged up need to clean.

3.Action taken to correct problem:

Steam clean filter cartriges

4.Item corrected by:

A.Maintenance Dept:____ C.Plant Personnel: X

B.Outside Contractor:____ D.Other:____

List Names of personnel or company responding:

Jesus Vela

Miguel Godoy

5.Correction Start Date: 10-13-94 Correction Finish Date: 10-13-94

Report completed by [signature] Date: 10-14-94

ATTACHMENT I

Sample Analysis Requests and Chain of Custody
(1 page)

State of California-Health and Welfare Agency

Department of Health Services
Hazardous Materials Laboratory

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

1. Authorization Number: [illegible]

HML No. To

2. Page of 1

3. Requestor: [illegible] 4. Phone ( ) [illegible]
Address (To Receive Results): [illegible]

5. Priority [1]
a. Authorized by

6. Date Sampled [illegible] 7. Time Sampled [illegible] Hours

8. Codes (fill in all applicable codes)
a. STC
b. Region
c. TPC
d. INDEX
e. PCA
f. SITE
g. County

9. Activity: ☑ SEB ☐ SMB ☐ FPB ☐ ATD ☐ PASD ☐ Other

10. SAMPLING LOCATION

a. EPA ID No. [illegible]

b. Site [illegible] CFC Inc.

c. Address [illegible] (Number / Street / City / Zip)

DC-07

11. SAMPLES

a. ID	b. Collector's No.	c. Lab No.	Sample d. Type	Container e. Type	Container f. Size	g. Field Information
A	[illegible]	[illegible]	[illegible]		[illegible]	
B						
C						
D						
E						
F						
G						
H						

12. ANALYSIS REQUESTED

ATTACH. 1

a. ☐ pH
b. ☐ Metal Scan
c. ☐ Metals (Spec)
d. ☐ W.E.T.
f.
g.
h.
i.
j. ☐ SVO-8270
k. ☐ Ext. Org (Screening)
i. ☐ Flash Point
m. ☐
n. ☐
o. ☐

13. SUPPLEMENTAL REQUESTS ☐ ☐ ☐ ☐

Initials
Date

14. CHAIN OF CUSTODY

	Signature	Name/Title	Inclusive Dates
a.	[illegible]	[illegible]	[illegible]
b.	[illegible]	[illegible]	[illegible]
c.			/ / - / /
d.			/ / - / /

15. SPECIAL REMARKS:

16. ASSIGNED TO: Date

17. LAB REMARKS:

FIELD

LAB

ATTACHMENT J

Field Report of Violation - 2 Pages

STATE OF CALIFORNIA — CALIFORNIA ENVIRONMENT PROTECTION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
1011 N. GRANDVIEW AVENUE
GLENDALE, CA 91201
(818) 551-2800

FIELD REPORT OF VIOLATION

Date(s) of Inspection OCTOBER 13; 14, 1994

Company Name Rollins OPC, Inc.
Address 5756 Alba St.
Los Angeles CA. 90058
EPA ID CAD 050806850

Representatives Present

ROLLINS OPC INC.
William J. Mitzel, President
Chris J. Lilley, Technical Manager.
Desmond Phillip, Plant Engineer/Process Manager
Wilfred I. Ndubuizu, Environmental Affairs Manager.
Richard A. Iniguez, Technical Representative

DTSC
Jose Diaz,
Carlos Ortega
Robert Krug
Larry Stuck.

Discussion with Management/Potential Violations Observed

(1) Unlabeled pallet containing Nicad batteries in drum warehouse storage area.
(2) Incompatible waste next to each other in staging area.
(3) Spilled dry filter cake north of the filter press unit. (Sample collected)
(4) Missing information on hazardous waste labels (Faded or erased) in Poison Bay.
(5) Operation of drum crusher without authorization.
(6) List of training requirements for Operations Manager.
(7) Missing/wrong information on Inspection Logs/Reports. (i.e. initials and or signature of inspectors instead of the name of inspector.)
(8)

Dicussion with Management (continued)

The purpose of this Field Report of Violation is to inform you immediately about violations observed at your facility. Further evaluation of information obtained as part of this inspection may result in the Department informing you of additional violations. Issues that the Department will evaluate further include:

(1) Load rejection procedures.
(2) Training records for Gory Young to be submitted for review.
(3) Profiles of incompatible wastes.

Authorized Company Representative*	Authorized State Agent
Name Wilfred Johnson	Name Jose Diaz
Title Environmental Affairs Mgr	Title Hazardous Substances Scientist
Signature	Signature
Date 10/14/94	Date October 14, 1994

*** Signature of company representative signifies receipt of copy of this form.**

ATTACHMENT K

Hazardous Waste Facility Permit
(2 Pertinent Pages)

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

Facility:

Oil Process Company
5756 Alba Street
Los Angeles, CA 90058

Operator:

Oil Process Company
5756 Alba Street
Los Angeles, CA 90058

HAZARDOUS WASTE FACILITY PERMIT

No. 90-3-TS-001

EPA ID Number: CAD 050806850

Effective Date: May 29, 1990

Expiration Date: May 29, 1995

Pursuant to Section 25200 of the California Health and Safety Code, this Hazardous Waste Facility Permit is hereby issued to Oil Process Company, Los Angeles. The issuance of this permit is subject to the conditions set forth in Attachment A which consists of 40 pages.

Where appropriate, this permit is also subject to the State of California Health and Safety Code, Sections 25159.5 and 25159.6, relating to the incorporation of Federal regulations in the absence of equivalent State regulations.

Dennis A. Dickerson
Regional Administrator
Region 3
Toxic Substances Control Program

May 29, 1990
Date

Containers received are typically unlined steel drums of specification such as 17C, 17E, 17H, and 37A with sizes ranging from 5 to 55 gallons.

The maximum number of drums to be stored at the facility at one time is 2,411 55-gallon drums or their equivalent volume.

a. Containers holding hazardous wastes shall be stored only in the area designated in the approved Operation Plan.

b. A container holding hazardous waste shall remain closed during storage, except when it is necessary to add or removed waste.

c. A container holding hazardous waste shall not be handled or stored in a manner which might rupture the container or cause it to leak.

d. A label shall be maintained on all containers in which hazardous wastes are stored. Labels shall include the following information:

   (1) Composition and physical state of the waste;

   (2) Special safety recommendations and precautions or handling the waste;

   (3) Statement or statements which call attention to the particular hazardous properties of the waste;

   (4) Name and address of the facility producing the waste; and

   (5) Date accumulation begins or date of acceptance at the storage facility.

e. Empty containers contaminated with hazardous waste and hazardous materials shall be stored, handled, and processed as hazardous waste or recycled whenever possible.

f. The total number of containers storing hazardous waste in the storage area shall not exceed the designed capacity of the storage area at any one time.

g. Containers used for storing hazardous waste shall be in a condition such that the containers can be safely transported, handled, or moved.

ATTACHMENT L

Permit Inspection Checklist
(10 Pages)

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

PERMIT INSPECTION CHECKLIST

Facility Name Rollins OPC ID No. CAD050806850

Facility Address 5756 ~~ALBA~~ ALBA St. L.A. 90058

Date(s) Inspected 10/13 - 10/14 - 1994 Inspected By J DIAZ

All items listed below are included in the inspection, unless lined out to indicate the item was not evaluated.

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NOTE:

- The violations cited below are from California Health and Safety Code, Sections 25100 et seq. and title 22, California Code of Regulations.
- Check mark notes a Violation.
- RCRIS violation codes are given in parentheses for each violation (e.g. **DG8**).

II. PERMIT REQUIREMENTS

Permit Requirements

1__ 66270.30(e) Failed to properly operate and maintain all facilities and systems of treatment and control installed or used to achieve compliance with permit conditions.

2__ 66270.30(l)(1) Failed to notify the Department at least 30 days in advance of planned physical alterations or additions to the permitted facility.

3__ 66270.30(l)(6) Failed to report any noncompliance which may endanger health or the environment within 24 hours from the time permittee becomes aware of circumstances.

4__ 66270.30(a) Failed to comply with the following conditions of the Permit:_____

_____

_____

_____

_____

5__ 66270.30(a) Failed to comply with the following conditions of the Operation Plan (Part B Application):_____

_____

_____

_____

_____

_____

Extremely Hazardous Wastes

6__ 67430.1(a) Failed to handle or dispose extremely HW pursuant to Extremely HW Permit issued by the Department.

7__ 67430.1(b) Disposed of EHW without obtaining Extremely Hazardous Waste Disposal Permit from the Department.

8__ 67430.1(c) HW disposal site accepted EHW without a copy of the EHW Permit.

III. WALKTHROUGH OBSERVATIONS

Security (See Guidance p. 8)

9__ 66264.14(b) Inadequate security measures at active portion of facility to control unauthorized entry. (DGS)

10__ 66264.14(c) Failed to post "Danger Hazardous Waste Area - Unauthorized Personnel Keep Out" sign(s) at each entrance to active portions of the facility. (DGS)

11__ 66264.14(c) Posted sign(s) illegible at 25 feet distance and/or not written in English, Spanish and other applicable languages. (DGS)

Preparedness and Prevention (See Guidance p. 8)

12✓ 66264.31 Facility not maintained or operated to minimize possibility of fire, explosion, or release of HW or HW constituents to air, soil, or surface water which could threaten human health or the environment. (DPP)

13__ 66264.32(a) Internal communications or alarm system not provided. (DPP)

14__ 66264.32(b) A device (i.e. telephone or two-way radio) capable of calling outside emergency help not provided. (DPP)

15__ 66264.32(c) Portable fire extinguishers, fire control equipment, spill control equipment, and/or decontamination equipment not provided. (DPP)

16__ 66264.32(d) Adequate water, foam producing equipment, or automatic sprinklers not provided. (DPP)

17__ 66264.33 Failed to test and maintain all communications or alarm systems, fire protection, spill control, or decontamination equipment. (DPP)

18__ 66264.34 No immediate access to emergency communication and/or alarm system during HW handling. (DPP)

19__ 66264.35 Failed to maintain adequate aisle space. (DPP)

20__ 66264.37 No arrangements made with police, fire department, emergency response, local hospital, Office of Emergency Service, and/or emergency response contractors. (DPP)

Use and Management of Containers (See Guidance p. 7-8)

21__ 66264.171 Failed to transfer HW from containers not in good condition or leaking to containers in good condition. (DMC)

22__ 66264.172 Failed to use container or liner that was compatible with HW to be stored or transferred. (DMC)

23__ 66264.173(a) Failed to keep containers of HW closed except when adding or removing HW. (DMC)

24__ 66264.173(b) Handled container of HW in a manner which may cause it to rupture or leak. (DMC)

25__ 66264.174 Failed to inspect areas where containers are stored or transferred at least weekly, looking for leaking containers and deterioration of containers and containment system. (DGS)

26__ 66264.175(a) Container transfer and storage area lacked containment system. (DMC)

27__ 66264.175(b)(1) The base of the container transfer and storage area containment system has cracks or gaps and cannot contain leaks, spills, and accumulated precipitation. (DMC)

28__ 66264.175(b)(2) The base of the container transfer and storage area containment system is not sloped or the system is not otherwise designed and operated to drain and remove liquids from leaks, spills, or precipitation, unless containers are elevated or otherwise protected from contact with accumulated liquids. (DMC)

29__ 66264.175(b)(3) Container transfer and storage area containment system lacks sufficient capacity to contain precipitation from a 24-hour, 25-year storm plus 10% of aggregate volume of all containers with free liquid or volume of largest container, whichever is greater. (DMC)

30__ 66264.175(b)(4) Failed to prevent run-on into containment system that lacked excess capacity. (DMC)

31__ 66264.175(b)(5) Failed to remove spilled or leaked waste and accumulated precipitation from containment system to prevent overflow. (DMC)

32__ 66264.176 Failed to locate ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line. (DMC)

33__ 66264.177(a) Incompatible wastes or wastes and materials were placed in the same container without complying with 66264.17(b). (DMC)

34__ 66264.177(b) Placed HW in unwashed container that previously held incompatible waste or material. (DMC)

35√ 66264.177(c) Container of HW which was incompatible with any other waste or material stored nearby in other containers, tanks, waste piles, or surface impoundments was not separated or protected by a berm or other devise. (DMC)

Tanks (See Guidance p.9)

Existing systems (installed before 7/14/86):

36__ 66264.191(a) Failed to determine whether tank is leaking or unfit and keep written integrity assessment certified by registered professional engineer for tanks without secondary containment. (DTR)

37__ 66264.191(b) Assessment failed to determine whether tank system is adequately designed, of sufficient structural strength, and compatible with HW. (DTR)

38__ 66264.191(d) If found to be leaking or unfit for use, failed to comply with 66264.196. (DTR)

New tank systems (installed after 7/14/86):

39__ 66264.192 Failed to obtain or retain on-site the required written assessment and certification statements for design and installation of new tank systems. (DTR)

40__ 66264.193 Failed to provide required secondary containment. [refer to guidance document for compliance dates] (DTR)

41__ 66264.194(a) Placed HW or treatment reagents in tank system which caused the tank, containment system or ancillary equipment to leak, corrode, rupture, or fail. (DTR)

42__ 66264.194(b) Failed to use controls and practices to prevent spillage and overflows from tank system. (DTR)

43__ 66264.194(b)(3) Failed to maintain sufficient freeboard (60 cm/2 ft) in uncovered tanks to prevent overtopping. (DTR)

44__ 66264.195(a) Failed to conduct daily inspection of tanks for following: discharge control equipment, corrosion, releases, monitoring and leak detection data, construction materials and secondary containment areas, and level of waste in uncovered tanks. (DTR)

45__ 66264.195(b) Failed to inspect cathodic protection systems (if present) and sources of impressed current as appropriate. (DTR)

46__ 66264.195(c) Failed to maintain results of tank inspections in the operating record. (DTR)

47__ 66264.196 Failed to remove from service immediately a tank system or secondary containment system that had leaked or spilled. (DTR)

48__ 66264.197(a) During closure of tank system, failed to remove or decontaminate all waste residues, contaminated tank system, soils, and manage them as HW. (DTR)

49__ 66264.197(c) When facility closed a tank system that lacked required secondary containment, they failed to include contingent closure and post-closure plans. (DTR)

50__ 66264.198(a) Stored or treated in tanks ignitable or reactive waste so as to cause the waste to ignite or react. (DTR)

51__ 66264.198(b) Failed to comply with buffer zone requirements for tanks containing ignitable or reactive wastes per NFPA "Flammable and Combustible Liquids Code. (DTR)

52__ 66264.199(a) Stored incompatible wastes in same tank without complying with 66264.17(b). (DTR)

53__ 66264.199(b) Placed HW in non-decontaminated tanks that previously held an incompatible waste or material without complying with 66264.17(b). (DTR)

Ignitable, Reactive, or Incompatible Wastes
{This sections applies to containers, tanks, waste piles, surface impoundments where ignitable, reactive or incompatible wastes stored, treated, or disposed.}

54__ 66264.17(a) Failed to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. (DGS)

55__ 66264.17(a) Ignitable or reactive waste was not separated and protected from sources of ignition or reaction. (DGS)

56__ 66264.17(a) Failed to place "No Smoking" signs wherever hazard from ignitable or reactive waste. (DGS)

57__ 66264.17(b) Failed to conduct transfer, storage, treatment, or disposal of ignitable or reactive wastes / mixture or commingling of incompatible wastes/materials to prevent:

__ (1) Generation of extreme heat or pressure, fire or explosion, or violent reaction.
__ (2) Production of uncontrolled toxic mists, fumes, dusts or gases to threaten human health or environment.
__ (3) Production of uncontrolled flammable fumes or gases to pose risk of fire or explosions.
__ (4) Damage to structural integrity of HW containment devices.
__ (5) Threat to human health or the environment. (DGS)

58__ 66264.17(c) Failed to document compliance based on literature, trial tests, waste analyses, or similar treatment. (DGS)

IV. DOCUMENT REVIEW

Manifest System (See Guidance p. 10)

59__ 66264.71(a)(1) Failed to sign and date copy of manifest for HW received from off-site. (DMR)

60__ 66264.71(a)(2) Failed to note significant discrepancies in the manifest. (DMR)

61__ 66264.71(a)(3) Failed to give copy of signed manifest to transporter. (DMR)

62__ 66264.71(a)(4)(5) Failed to send copy of manifest to the Department and generator within 30 days. (DMR)

63__ 66264.71(a)(6) Failed to retain copy of each manifest for at least 3 years. (DMR)

64__ 66266.81(a)(6)(B) Failed to retain copy of manifest or bill of lading for spent lead acid batteries for 3 years. (DMR)

65__ 66264.71(b)(1-6) Failed to sign and date shipping paper or manifest from rail or water shipment, submit copies, retain copies, and/or note discrepancies in manifest. (DMR)

66__ 66264.72(b) If discrepancy is not resolved within 15 days after receiving waste, failed to submit a letter to the Department. (DMR)

67__ 66264.76 Failed to submit unmanifested waste report to the Department within 15 days after receiving the waste from off-site. (DMR)

68__ 66266.120(a)(3) Accepted > 10 lb. elemental mercury from off-site without a manifest or from registered hauler. (DMR)

Land Disposal Restrictions (LDR) (See Guidance p. 11)

69__ 66268.7(b) Failed to test waste according to WAP for LDR. (DLB)

70__ 66268.7(b)(4) Failed to send notice with each waste shipment to land disposal facility. (DLB)

71__ 66268.7(b)(5) When applicable, failed to submit certification with each shipment of waste or treatment residue of restricted waste to land disposal facility. (DLB)

72__ 66268.7(b)(6) TSDF failed to comply with notice and certification (when applicable) for waste or treatment residue which will be further managed at different treatment or storage facility. (DLB)

73__ 66268.7(c)(1) Land disposal facility failed to keep copies of notice and certification and test waste to assure waste or treatment residues are in compliance with treatment standards and prohibitions. (DLB)

74__ 66268.7(c)(2) Land disposal facility failed to test waste or treatment residue according to facility's WAP. (DLB)

Recordkeeping and Reporting (See Guidance p. 12, 13)

75__ 66264.12(a) Failed to notify the Department at least four weeks in advance of the arrival of initial load of HW from a foreign source. (DGS)

76__ 66264.12(b) Failed to inform generator in writing that the facility shipped HW and/or failed to keep a copy of this manifest. (DGS)

77__ 66264.12(c) Failed to notify the new owner or operator of the facility in writing of requirements of Chapter 14 and Chapter 20 of Title 22. (DGS)

78__ 66264.73(a) Failed to keep written operating record on-site. (DMR)

79__ 66264.73(b) Failed to record all information and maintain operating record until closure of the facility. (DMR)

80_✓ 66264.74(a) Failed to furnish all records and plans upon request. (DMR)

81__ 66264.75 Failed to prepare and submit copies of annual report to the Department by March 1 of each year. (DMR)

82__ 66264.75 Annual report lacked required information. (DMR)

Contingency Plan and Emergency Procedures (See Guidance p.14)

83__ 66264.51(a) No contingency plan. (DCP)

84__ 66264.51(b) Failure to implement contingency plan whenever there is a fire, explosion, or release of HW which could threaten human health or environment. (DCP)

85__ 66264.52(a) Incomplete contingency plan. (DCP)

86__ 66264.53(a)(1) Contingency plan not maintained on site. (DCP)

87__ 66265.53(a)(2) Contingency plan not submitted to local emergency authorities. (DCP)

88__ 66264.54 Contingency plan not amended as necessary. (DCP)

89__ 66264.55 No emergency coordinator either on premises or on-call at all times. (DCP)

90__ 66264.56 Emergency coordinator failed to immediately implement the emergency procedures. (DCP)

91__ 66264.56(j) Facility failed to note required information in operating log and submit written report to the Department within 15 days. (DCP)

General Inspection Requirements (See Guidance p. 15)

92__ 66264.15(b)(1) Failed to develop and follow inspection schedule. (DGS)

93__ 66264.15(b)(2) Failed to keep a copy of the inspection schedule. (DGS)

94✓ 66264.15(b)(3) Inspection schedule failed to identify appropriate problems to be looked for. (DGS)

95__ 66264.15(c) Failed to remedy deteriorating or malfunctioning equipment or structures revealed during inspection. (DGS)

96✓ 66264.15(d) Failed to record all the required information in the inspection schedule. (DGS)

97__ 66264.15(d) Failed to keep the complete inspection records for 3 years. (DGS)

Personnel Training (See Guidance p. 16)

98__ 66264.16(a)(1) Personnel failed to complete training course to assure compliance with HW requirements. (DGS)

99__ 66264.16(a)(2) Training program was not directed by a person trained in HW procedures and/or not relevant to employees' job duties. (DGS)

100__ 66264.16(a)(3) Training program failed to ensure that facility personnel are able to respond to emergencies. (DGS)

101__ 66264.16(b) Personnel failed to complete the required training program within 6 months or worked in unsupervised positions prior to completing the training requirements. (DGS)

102__ 66264.16(c) Personnel failed to receive an annual review of their initial training. (DGS)

103✓ 66264.16(d) Failed to maintain all the required training documentation on-site. (DGS)

104__ 66264.16(e) Failed to keep training records on current personnel and/or former employees within the last 3 years on-site. (DGS)

Waste Analysis Plan (WAP) (See Guidance p. 17)

105__ 66264.13(a) Failed to obtain detailed waste analyses. (DGS)